

Exhibit V

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

CASE NO. 24-81143-CIV-DMM

777 PARTNERS LLC and SUTTONPARK
CAPITAL LLC,

Plaintiff,

vs.

LEADENHALL CAPITAL PARTNERS LLP,
LEADENHALL LIFE INSURANCE LINKED
INVESTMENTS FUND PLC, NOAH DAVIS,
SAIPH CONSULTING LLC, and PAUL KOSINSKI,

Defendant.

_____ /

VIDEOTAPED DEPOSITION OF ALEXANDER ADNANI

TAKEN ON BEHALF OF THE DEFENDANT

MARCH 24, 2025
9:00 A.M. TO 12:30 P.M.

KING & SPALDING LLP
200 SOUTH BISCAYNE BOULEVARD, SUITE 4700
MIAMI, FLORIDA 33131

REPORTED BY:
MICHELLE VILLALOBOS, COURT REPORTER, CER, CDR
NOTARY PUBLIC, STATE OF FLORIDA



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<p>01 APPEARANCES OF COUNSEL</p> <p>02 ON BEHALF OF THE DEFENDANT:</p> <p>03 FRANCIS D. MURRAY, ESQUIRE</p> <p>04 STUMPHAUZER KOLAYA NADLER & SLOMAN, PLLC</p> <p>05 2 SOUTH BISCAYNE BOULEVARD SUITE 1600</p> <p>06 MIAMI, FLORIDA 33131-1824</p> <p>07 305-614-1400</p> <p>08 FMURRAY@SKNLAW.COM</p> <p>09</p> <p>10 ALSO PRESENT:</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>ASHLEY TAYLOR, VIDEOGRAPHER</p>	<p>01 INDEX OF EXHIBITS</p> <p>02 EXHIBIT DESCRIPTION PAGE</p> <p>03</p> <p>04 NO EXHIBITS MARKED</p> <p>05</p> <p>06</p> <p>07</p> <p>08</p> <p>09</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>



<p style="text-align: right;">Page 6</p> <p>01 VIDEOTAPED DEPOSITION OF ALEXANDER ADNANI</p> <p>02 MARCH 24, 2025</p> <p>03 THE COURT REPORTER: We're now on the video</p> <p>04 record. Today's date is Monday, March 24th, 2025,</p> <p>05 and the time is 09:16 A.M.</p> <p>06 This is the video deposition of Alexander</p> <p>07 Adnani, taken in the matter of 777 Partners, LLC</p> <p>08 and SuttonPark Capital LLC vs. Leadenhall Capital</p> <p>09 Partners, LLP et al. This deposition is being</p> <p>10 conducted at 200 South Biscayne Boulevard, Miami,</p> <p>11 Florida.</p> <p>12 The Court Reporter is Michelle Villalobos and</p> <p>13 the Videographer is Ashley Taylor.</p> <p>14 Would Counsel, please announce their</p> <p>15 appearances for the record?</p> <p>16 MR. DONOVAN: Sure. Brian Donovan from King</p> <p>17 and Spalding on behalf of the Leadenhall,</p> <p>18 Defendants.</p> <p>19 MR. BOLAND: Jim Boland from Smith Gambrell</p> <p>20 Russell on behalf of the Plaintiffs.</p> <p>21 MR. FEUER: Good Morning, Leonard Feuer,</p> <p>22 Leonard Feuer, P.A. on behalf of Noah Davis.</p> <p>23 MR. MORLAN: Harold E. Morlan III on behalf of</p> <p>24 Shutts and Bowen, I mean with Shutts and Bowen on</p> <p>25 behalf of Paul Kosinski and Saiph Consulting, LLC.</p>	<p style="text-align: right;">Page 8</p> <p>01 Fifth Amendment right to against self-incrimination and</p> <p>02 respectfully decline to answer your question.</p> <p>03 Q. Sure. And so, for any Fifth Amendment --</p> <p>04 A. Yeah.</p> <p>05 Q. Indications if you want to, you can say</p> <p>06 anything so long as it references five, you can say the</p> <p>07 whole thing if you want to, but if you just say Fifth</p> <p>08 Amendment or take five or something like that, that's</p> <p>09 fine. If you're amenable to that --</p> <p>10 A. Whatever --</p> <p>11 Q. I invoke the fifth --</p> <p>12 A. Invoke.</p> <p>13 Q. I take the fifth, whatever you want to say, if</p> <p>14 it says --</p> <p>15 A. Okay.</p> <p>16 Q. If it uses the word five or fifth. How did</p> <p>17 you prepare for this deposition?</p> <p>18 A. Can you repeat the question?</p> <p>19 Q. Sure. How did you prepare for this</p> <p>20 deposition?</p> <p>21 A. Just having conversations with my Counsel.</p> <p>22 Q. How many conversations with Counsel did you</p> <p>23 have?</p> <p>24 A. I think just one.</p> <p>25 Q. And which Counsel are you referring to?</p>
<p style="text-align: right;">Page 7</p> <p>01 MR. MURRAY: Francis Murray from Stumphauzer</p> <p>02 Kolaya Nadler and Sloman on behalf of Mr. Adnani.</p> <p>03 Thereupon:</p> <p>04 ALEXANDER ADNANI,</p> <p>05 was called as a witness, and after having</p> <p>06 been first duly sworn, testified as follows:</p> <p>07 DIRECT EXAMINATION</p> <p>08 BY MR. DONOVAN:</p> <p>09 Q. Okay. Mr. Adnani, how's it going today?</p> <p>10 A. Good, how are you?</p> <p>11 Q. Good. Can you state your full name for the</p> <p>12 record?</p> <p>13 A. Alexander Adnani.</p> <p>14 Q. Can you give me your, your home address?</p> <p>15 A. Yes. 488 Northeast 18th Street, Miami,</p> <p>16 Florida 33132.</p> <p>17 Q. Can you give me your work address?</p> <p>18 A. Currently I am remote at this point.</p> <p>19 Q. Have you ever been deposed before?</p> <p>20 A. No.</p> <p>21 Q. Have you ever given any type of testimony</p> <p>22 before either oral or written?</p> <p>23 A. Yes.</p> <p>24 Q. What type of testimony are you referring to?</p> <p>25 A. Under the advice of Counsel in invoking my</p>	<p style="text-align: right;">Page 9</p> <p>01 A. The Counsel that's here today, Francis Murray.</p> <p>02 Q. All right. Did you have any conversations</p> <p>03 with Counsel for -- strike that. Do you know who the</p> <p>04 Plaintiff's are in this case?</p> <p>05 A. Yes.</p> <p>06 Q. All right. I'll represent to you that they're</p> <p>07 777 Partners and SuttonPark Capital. Is that fair?</p> <p>08 A. Yes.</p> <p>09 Q. Did you have any conversations to prepare for</p> <p>10 today's deposition with Counsel for the Plaintiff's?</p> <p>11 A. No.</p> <p>12 Q. Did you have any conversations to prepare for</p> <p>13 today's deposition with any Counsel other than Counsel</p> <p>14 who's in the room with you right now?</p> <p>15 A. No.</p> <p>16 Q. Did you review any documents to prepare for</p> <p>17 today's deposition?</p> <p>18 A. No, I don't believe so.</p> <p>19 Q. What's your job title currently?</p> <p>20 A. Going to in invoke fifth.</p> <p>21 Q. Are you employed by 777 Partners currently?</p> <p>22 A. Yes.</p> <p>23 Q. Are you employed by SuttonPark Capital</p> <p>24 currently?</p> <p>25 A. My employer is 777.</p>

<p style="text-align: right;">Page 10</p> <p>01 Q. Is there any difference between 777 Partners 02 and SuttonPark Capital?</p> <p>03 MR. BOLAND: Object to the form.</p> <p>04 A. What did you say, sir?</p> <p>05 BY MR. DONOVAN:</p> <p>06 Q. Sorry. He said, so he objected to the form. 07 And so, I'll do it. He objected to the form, 08 which is going to happen sometimes.</p> <p>09 A. Okay.</p> <p>10 Q. So, I'll ask the question, your Counsel or 11 Counsel on the Zoom may object to form and then you -- 12 you'd still have to answer the question unless you're 13 instructed not to by your Counsel, basically --</p> <p>14 A. Understood.</p> <p>15 Q. So, I'll ask my question again. Give me a 16 second because I think Counsel on the Zoom or -- Counsel 17 on the Zoom is going to object to form?</p> <p>18 A. Okay.</p> <p>19 Q. Are 777 Partners in SuttonPark Capital the 20 same thing?</p> <p>21 MR. BOLAND: Object to the form.</p> <p>22 A. I invoke the fifth.</p> <p>23 BY MR. DONOVAN:</p> <p>24 Q. Let me try it again. Are 777 Partners in 25 SuttonPark Capital the same entity?</p>	<p style="text-align: right;">Page 12</p> <p>01 privilege instruction?</p> <p>02 MR. MURRAY: That was a privilege instruction, 03 yeah.</p> <p>04 BY MR. DONOVAN:</p> <p>05 Q. All right. Let me just ask it again to make 06 sure that the objection, I understand the objection from 07 your Counsel and your answer.</p> <p>08 Outside of any communications you've had with 09 Counsel concerning any of the lawsuits involving 10 Leadenhall and 777 Partners.</p> <p>11 What's your understanding of the New York 12 lawsuit between 777 Partners in Leadenhall?</p> <p>13 A. I invoke the fifth.</p> <p>14 Q. Do you understand that you're here testifying 15 about the Florida lawsuit between Leadenhall on the one 16 hand and other Defendant's and on the other hand 777 17 Partners in SuttonPark?</p> <p>18 A. Yes.</p> <p>19 Q. What's your understanding of this Florida 20 lawsuit?</p> <p>21 MR. MURRAY: Same instruction as before 22 regarding privilege. If you have an independent 23 understanding of the lawsuit, you can go ahead and 24 answer it, but if you do not then or invoking 25 privilege or instruction not to answer.</p>
<p style="text-align: right;">Page 11</p> <p>01 MR. BOLAND: Same objection.</p> <p>02 A. I invoke the fifth.</p> <p>03 BY MR. DONOVAN:</p> <p>04 Q. Can you describe for me your job 05 responsibilities currently?</p> <p>06 A. I invoke the fifth.</p> <p>07 Q. Do you understand that there are lawsuits in 08 both New York and Florida between 777 Partners on the 09 one hand and Leadenhall on the other hand?</p> <p>10 A. Have you rephrase that? I apologize --</p> <p>11 Q. Sure. Do you -- I'm just asking you yes or no 12 really. Do you understand that there are lawsuits 13 pending in both New York and Florida between 777 14 Partners and affiliates on the one hand and Leadenhall 15 on the other hand?</p> <p>16 A. Yes.</p> <p>17 Q. What's your understanding of the New York 18 lawsuit between 777 Partners and affiliates and 19 Leadenhall?</p> <p>20 MR. MURRAY: Mr. Adnani, if you have an 21 independent understanding of that outside of 22 conversations with Counsel, you should go ahead and 23 answer it. If you do not, you should not answer.</p> <p>24 A. Okay. I'm invoking the fifth.</p> <p>25 MR. DONOVAN: Sorry, was that a -- was that a</p>	<p style="text-align: right;">Page 13</p> <p>01 A. Okay. I don't believe that I have an -- a 02 complete understanding of the lawsuit between or that 03 we're discussing today.</p> <p>04 BY MR. DONOVAN:</p> <p>05 Q. Understood that you don't have a complete 06 understanding of the Florida lawsuit between 777 07 Partners on the one hand and Leadenhall and other 08 Defendant's on the other hand.</p> <p>09 Do you have any understanding of the lawsuit 10 that you're here testifying about today?</p> <p>11 A. To be honest not entirely.</p> <p>12 Q. Sure. I'm just, I understand that you don't 13 have a complete understanding or an entire 14 understanding. I'm just asking do you know anything 15 about why you're here testifying today?</p> <p>16 A. Yes.</p> <p>17 Q. What's your understanding of what this case is 18 about?</p> <p>19 A. Noah Davis and Saiph Consulting, is it, and 20 777.</p> <p>21 Q. Can you say more there?</p> <p>22 A. I don't know that I really have more 23 information than that.</p> <p>24 Q. Well, what's your understanding of what Noah 25 Davis and Saiph allegedly did that gave rise to this</p>

<p style="text-align: right;">Page 14</p> <p>01 lawsuit?</p> <p>02 MR. MURRAY: Same instructions as before. If</p> <p>03 you have an independent basis outside of our</p> <p>04 conversations, you can go ahead and answer on that</p> <p>05 basis, otherwise I'm instructing you not to answer</p> <p>06 based on privilege.</p> <p>07 A. Okay. What I heard is some equipment was</p> <p>08 stolen from an office of SuttonPark, but I don't have</p> <p>09 any other understanding.</p> <p>10 BY MR. DONOVAN:</p> <p>11 Q. Who did you hear stole equipment from an</p> <p>12 office of SuttonPark?</p> <p>13 A. Noah, I believe.</p> <p>14 Q. Noah Davis --</p> <p>15 A. This is --</p> <p>16 Q. -- Sorry, go ahead?</p> <p>17 A. -- strictly, I believe an article that I saw,</p> <p>18 so I don't have any further information regarding the</p> <p>19 issue.</p> <p>20 Q. I see. So, is it fair to say that your basis</p> <p>21 for understanding that this lawsuit is about Noah Davis</p> <p>22 taking equipment allegedly from a SuttonPark office</p> <p>23 building is news articles?</p> <p>24 A. Could you re-say that?</p> <p>25 Q. Sure. So, let me ask you like this. What's</p>	<p style="text-align: right;">Page 16</p> <p>01 A. Yes.</p> <p>02 Q. Do you know until when approximately?</p> <p>03 A. I don't recall an exact date.</p> <p>04 Q. How much interaction did you have with Paul</p> <p>05 Kosinski while he was SuttonPark Capital's CEO?</p> <p>06 A. I'm going to invoke the fifth.</p> <p>07 Q. Did he have any interactions with Paul</p> <p>08 Kosinski while he worked at SuttonPark Capital?</p> <p>09 A. I'm going to invoke the fifth.</p> <p>10 Q. Do you know who Noah Davis is?</p> <p>11 A. He was CTO of 777.</p> <p>12 Q. Okay. So, Noah -- is your testimony that Noah</p> <p>13 Davis was formerly Chief Technology Officer of 777</p> <p>14 Partners?</p> <p>15 A. To the best of my knowledge.</p> <p>16 MR. BOLAND: Objection.</p> <p>17 THE COURT REPORTER: I didn't hear.</p> <p>18 MR. DONOVAN: Mr. Boland, you might have to</p> <p>19 speak up a little bit so we can, sorry, Mr. Boland,</p> <p>20 you might have to talk, speak up a little bit so</p> <p>21 that we can hear you when you object.</p> <p>22 MR. BOLAND: I will, I'm conscious of not</p> <p>23 trying to interrupt, so I'll try to speak up a</p> <p>24 little bit more.</p> <p>25 THE COURT REPORTER: Was that an objection he</p>
<p style="text-align: right;">Page 15</p> <p>01 your basis for your understanding that this lawsuit is</p> <p>02 about Noah Davis taking equipment allegedly from</p> <p>03 SuttonPark Capital's offices?</p> <p>04 A. I read a news article.</p> <p>05 Q. All right. Did -- is that your only basis?</p> <p>06 A. Yes.</p> <p>07 Q. Okay. What is Saiph?</p> <p>08 A. I believe it's consulting company started by</p> <p>09 Paul Kosinski.</p> <p>10 Q. And who is Paul Kosinski?</p> <p>11 A. He was formerly working for SuttonPark Capital</p> <p>12 as CEO.</p> <p>13 Q. Do you know what type of consulting services</p> <p>14 Saiph provides?</p> <p>15 A. No. Financial Service.</p> <p>16 Q. Your testimony is that Saiph provides</p> <p>17 financial consulting services?</p> <p>18 A. I don't know the extent of the services.</p> <p>19 Q. Do you know -- well, I'm just trying to ask a</p> <p>20 general question about what your understanding is, if</p> <p>21 any of what Saiph does?</p> <p>22 A. I believe that they provide financial</p> <p>23 specialty services would be my best interpretation.</p> <p>24 Q. Did you say that your understanding was that</p> <p>25 Paul Kosinski was formerly CEO of SuttonPark Capital?</p>	<p style="text-align: right;">Page 17</p> <p>01 used?</p> <p>02 MR. DONOVAN: He -- I think he objected to</p> <p>03 form. I don't remember the question. Do you mind</p> <p>04 reading the question back?</p> <p>05 THE COURT REPORTER: One second.</p> <p>06 MR. DONOVAN: I think, actually I think I</p> <p>07 remember the question. Why don't we -- why don't I</p> <p>08 try it again and then just if you don't mind giving</p> <p>09 Counsel a chance to object and then answer.</p> <p>10 THE COURT REPORTER: I can play it.</p> <p>11 MR. DONOVAN: I got -- no, I got it.</p> <p>12 BY MR. DONOVAN:</p> <p>13 Q. Is it your testimony that Noah Davis was</p> <p>14 previously Chief Technology Officer of 777 Partners</p> <p>15 MR. BOLAND: And I objected to the form.</p> <p>16 A. That was my understanding.</p> <p>17 BY MR. DONOVAN:</p> <p>18 Q. Do you know what his responsibilities were as</p> <p>19 Chief Technology Officer of 777 Partners?</p> <p>20 A. I don't believe I would be able to answer that</p> <p>21 question without having more information.</p> <p>22 Q. All right. Well, what's your understanding of</p> <p>23 the responsibilities of a Chief Technology Officer at a</p> <p>24 company like 777 Partners?</p> <p>25 MR. BOLAND: Object to the form.</p>

<p style="text-align: right;">Page 18</p> <p>01 A. I don't know that I would have all the 02 information to answer that question. 03 BY MR. DONOVAN: 04 Q. All right. Fair. Did you interact with Noah 05 Davis at all while he was Chief Technology Officer at 06 777 Partners? 07 A. Friendly interaction. 08 Q. Can you describe Noah Davis' personality? 09 A. He seemed very nice. 10 Q. Did he seem happy at his job? 11 MR. BOLAND: Object to the form. 12 A. I'm not sure I can answer that question. 13 BY MR. DONOVAN: 14 Q. I'm just asking based on your understanding or 15 what you saw, did Noah Davis seem happy on a day-to-day 16 basis? 17 MR. BOLAND: Object to the form. 18 A. I can't speak to his emotions. 19 BY MR. DONOVAN: 20 Q. Do you know when he -- do you know when he 21 resigned -- strike that. Do you know whether Noah Davis 22 resigned his position as Chief Technology Officer of 777 23 Partners? 24 A. I don't know. 25 Q. So, do you know whether Noah Davis is still</p>	<p style="text-align: right;">Page 20</p> <p>01 audit performed by Saiph on behalf of Leadenhall 02 beginning around late 2023? 03 A. I'll invoke the fifth. 04 Q. Do you know who Craig Gillespi is? 05 A. He -- I don't know his official title, but he 06 worked at Leadenhall. 07 Q. Is he the individual you interacted with at 08 Leadenhall the most concerning the credit facility 09 between 777 Partners in Leadenhall? 10 MR. BOLAND: Object to the form. 11 A. I'm invoking the fifth. 12 BY MR. DONOVAN: 13 Q. Do you know why Leadenhall wanted to conduct 14 an audit of or review its collateral starting around 15 2022? 16 MR. BOLAND: Object to the form. 17 A. I'm invoking the fifth. 18 BY MR. DONOVAN: 19 Q. Do you know whether Leadenhall engaged Saiph 20 to conduct an audit of its collateral? 21 A. I'm invoking the fifth. 22 Q. Can you tell me anything about collateral 23 audit conducted by Saiph on behalf of Leadenhall? 24 MR. BOLAND: Object to the form. 25 A. I'm invoking the fifth.</p>
<p style="text-align: right;">Page 19</p> <p>01 employed by 777 Partners? 02 MR. BOLAND: Object to the form. 03 A. I don't believe he is. 04 BY MR. DONOVAN: 05 Q. So, do you know when Noah Davis stopped being 06 employed by 777 Partners approximately? 07 A. That is unclear to me. 08 Q. Fair. Do you have any understanding 09 whatsoever, as to when Noah Davis left 777 Partners? 10 A. I don't think I would be able to answer it. 11 Q. Are you not able to answer because you don't 12 know or because you would prefer not to answer? 13 A. Because I don't know. 14 Q. Okay. Do you know why Noah Davis left his 15 position as Chief Technology Officer of 777 Partners? 16 A. No. 17 Q. Do you know whether Noah Davis ever worked as 18 an independent contractor for Saiph? 19 A. I don't know. 20 Q. What's your understanding of the term 21 collateral? 22 A. I'll invoke fifth there. 23 Q. All right. So, when I use the term 24 collateral, I'm referring to assets securing a loan. 25 Do you have any understanding of a collateral</p>	<p style="text-align: right;">Page 21</p> <p>01 BY MR. DONOVAN: 02 Q. Do you know whether 777 Partners objected to 03 Leadenhall performing an audit of its collateral? 04 MR. BOLAND: Object to the form. 05 A. I'm invoking fifth. 06 BY MR. DONOVAN: 07 Q. When I use the term A-CAP, I'm referring to an 08 insurance holding company called Advantage Capital 09 Holdings LLC. Do you understand that? 10 A. Yes. 11 Q. What is A-CAP? 12 A. I'm sorry, what is A-CAP? 13 Q. Yeah, let me try it again. Is A-CAP a lender 14 to 777 Partners? 15 A. I am invoking fifth. 16 Q. Did A-CAP object to Leadenhall using Saiph to 17 conduct an audit of Leadenhall's collateral in late 18 2023? 19 A. I'm invoking the fifth. 20 MR. BOLAND: Let me just insert an objection 21 to the form of that one after the fact, sorry about 22 that. 23 BY MR. DONOVAN: 24 Q. Did A-CAP object to Leadenhall performing an 25 audit of its collateral in 2023 because A-CAP knew that</p>

<p style="text-align: right;">Page 22</p> <p>01 collateral had been fictitiously pledged and double 02 pledged?</p> <p>03 MR. BOLAND: Object to the form. 04 A. I'm invoking the fifth. 05 BY MR. DONOVAN: 06 Q. Did 777 Partners in A-CAP initially object to 07 Leadenhall performing an audit of Leadenhall's 08 collateral because they were concerned that Leadenhall 09 would find out that assets had been fictitiously pledged 10 or double pledged?</p> <p>11 MR. BOLAND: Object to the form. 12 A. I'm invoking the fifth. 13 BY MR. DONOVAN: 14 Q. Do you know what the MP Fin computer system 15 is?</p> <p>16 A. I'm invoking the fifth. 17 Q. Is the MP Fin Computer System, the system in 18 which the 777 Partners Capital Markets Group allocates 19 assets to lenders?</p> <p>20 A. I'm invoking the fifth. 21 Q. Did you play any role in allocating assets to 22 lenders in MP Fin?</p> <p>23 MR. BOLAND: Object to the form. 24 A. I'm invoking the fifth. 25 BY MR. DONOVAN:</p>	<p style="text-align: right;">Page 24</p> <p>01 that we have a clear record. 02 Is it fair to say that you don't have any 03 understanding of who made the decision to file this 04 lawsuit against Leadenhall, Saiph, Paul Kosinski and 05 Noah Davis?</p> <p>06 A. No. 07 Q. Sorry, is it not fair to say that I'm asking 08 -- let me ask it one more time. Is it fair to say that 09 you don't have any understanding of who made the 10 decision to file this lawsuit against Leadenhall, Saiph, 11 Paul Kosinski and Noah Davis?</p> <p>12 A. I don't have a clear understanding. 13 Q. Do you have any understanding of who made the 14 decision to file this lawsuit against Leadenhall, Saiph, 15 Paul Kosinski and Noah Davis?</p> <p>16 A. No. 17 Q. Do you know whether this lawsuit was filed 18 against Leadenhall for the purpose of retaliating 19 against Leadenhall for filing the New York litigation?</p> <p>20 MR. BOLAND: Object to the form. 21 A. I'm invoking the fifth. 22 BY MR. DONOVAN: 23 Q. Did you play any role in the decision to file 24 this lawsuit? 25 A. How do you mean?</p>
<p style="text-align: right;">Page 23</p> <p>01 Q. Did you play any role in issuing compliance 02 reports to Leadenhall?</p> <p>03 A. I'm invoking the fifth. 04 Q. Do you know who made the decision to file this 05 Florida lawsuit against Leadenhall based on Noah Davis' 06 alleged intrusions?</p> <p>07 MR. BOLAND: Object to the form. 08 A. Could you repeat the -- 09 BY MR. DONOVAN: 10 Q. Sure. 11 A. -- the beginning of that? 12 Q. Sure. Do you know who at 777 Partners or A- 13 CAP made the decision to file this lawsuit against 14 Leadenhall based on alleged intrusions by Noah Davis?</p> <p>15 MR. BOLAND: Object to the form. 16 A. No. 17 BY MR. DONOVAN: 18 Q. All right. Fair to say you have no 19 understanding of who made the decision to file this 20 lawsuit?</p> <p>21 A. That's unclear to me. 22 Q. Sorry, is my question unclear to you? Is that 23 what you mean? 24 A. It's unclear, I don't know. 25 Q. Okay. Let me just ask my question again so</p>	<p style="text-align: right;">Page 25</p> <p>01 Q. Let me ask it this way. Prior to the lawsuit 02 being filed in Florida, were you in favor of initiating 03 a lawsuit against Leadenhall based on intrusions by Noah 04 Davis?</p> <p>05 A. I don't know that I understand the question. 06 Q. All right. What's your understanding of why 07 -- strike that. 08 What's your understanding of why Noah Davis 09 allegedly entered into SuttonPark Capital's office 10 buildings?</p> <p>11 A. I don't have an understanding why. 12 Q. You testified before that your understanding 13 of this lawsuit is that Noah Davis conducted 14 unauthorized physical entries into SuttonPark Capital's 15 office's -- office buildings, right?</p> <p>16 A. Well, no, I said that I read an article that 17 mentions, but I don't have any details or understanding 18 of why or how or any other information regarding the 19 incident. 20 Q. That's fair. So, I'm just asking apart from 21 what you read about Noah Davis conducting unauthorized 22 physical entries into an office building, do you have 23 any understanding of whether Noah Davis conducted 24 unauthorized intrusions into 777 Partners computer 25 systems?</p>

<p style="text-align: right;">Page 26</p> <p>01 A. The only understanding is what I've read in 02 the news article, which may or may not be true. I don't 03 have any information regarding the incident.</p> <p>04 Q. So, is your understanding of this lawsuit that 05 Noah Davis on one single occasion entered into 777 06 Partners or SuttonPark Capital's office buildings?</p> <p>07 MR. BOLAND: Object to the form.</p> <p>08 A. I don't have enough information to answer 09 that. As I said, I've read the news article and that's 10 the extent of my knowledge.</p> <p>11 BY MR. DONOVAN:</p> <p>12 Q. That's fair. So, I understand what you were 13 saying. I'm trying to ask my question correctly here.</p> <p>14 Do you have any understanding of whether, 15 aside from any physical -- sorry, withdrawn.</p> <p>16 Do you have any understanding of whether Noah 17 Davis conducted unauthorized intrusions into 777 18 Partners computer systems aside from any physical entry 19 into an office building?</p> <p>20 A. Do I have an understanding of that?</p> <p>21 Q. Sure.</p> <p>22 A. I don't believe that I do. I -- as I said, 23 read an article and I can't recall the details of the 24 article, but as I said, I had heard that he had stolen 25 equipment, but I have no basis of that other than the</p>	<p style="text-align: right;">Page 28</p> <p>01 A. I have no information about the incident or, 02 I'm unsure how to answer that. I don't have any 03 information regarding your question.</p> <p>04 BY MR. DONOVAN:</p> <p>05 Q. Okay. That's fair. Do you have any evidence 06 or factual basis to believe that Leadenhall directed 07 Noah Davis to conduct unauthorized intrusions into 777 08 Partners computer systems?</p> <p>09 MR. BOLAND: Object to the form.</p> <p>10 A. I have no information regarding that question.</p> <p>11 BY MR. DONOVAN:</p> <p>12 Q. Do you have any evidence or factual basis to 13 believe that Leadenhall benefited in any way from any 14 information taken by Noah Davis?</p> <p>15 MR. BOLAND: Object to form.</p> <p>16 A. I'm going to invoke the fifth.</p> <p>17 BY MR. DONOVAN:</p> <p>18 Q. Do you have any evidence or factual basis to 19 believe that Leadenhall ever received any information 20 taken by Noah Davis via unauthorized intrusions?</p> <p>21 MR. BOLAND: Object to form.</p> <p>22 A. I'll invoke the fifth.</p> <p>23 BY MR. DONOVAN:</p> <p>24 Q. Would you agree with me that you have no 25 factual basis or evidence to believe that Leadenhall</p>
<p style="text-align: right;">Page 27</p> <p>01 article.</p> <p>02 Q. Got it. So, is it fair to say that you don't 03 know one way or the other whether outside of Noah Davis 04 allegedly stealing equipment, he also conducted 05 unauthorized intrusions into the 777 Partners computer 06 systems?</p> <p>07 A. I don't know.</p> <p>08 Q. Do you have any evidence or factual basis to 09 believe that Leadenhall directed Noah Davis to steal 10 computer equipment?</p> <p>11 MR. BOLAND: Object to form.</p> <p>12 A. I'm invoking the fifth.</p> <p>13 BY MR. DONOVAN:</p> <p>14 Q. Do you have any evidence or factual basis to 15 believe that Leadenhall directed Noah Davis to conduct 16 an unauthorized entry into 777 Partners office 17 buildings?</p> <p>18 MR. BOLAND: Object to form.</p> <p>19 A. I'm sorry, could you repeat that?</p> <p>20 BY MR. DONOVAN:</p> <p>21 Q. Sure. Do you have any evidence or factual 22 basis to believe that Leadenhall directed Noah Davis to 23 break into 777 Partners or SuttonPark Capital's office 24 buildings?</p> <p>25 MR. BOLAND: Object to form.</p>	<p style="text-align: right;">Page 29</p> <p>01 directed Noah Davis to conduct unauthorized intrusions 02 in 777 Partners or SuttonPark Capital's computer 03 systems?</p> <p>04 MR. BOLAND: Object to form.</p> <p>05 A. I'm invoking the fifth.</p> <p>06 MR. DONOVAN: Do you mind if we take a 5- 07 minute break?</p> <p>08 THE WITNESS: Of course, yeah.</p> <p>09 MR. DONOVAN: All right, thanks. We can go 10 off the record.</p> <p>11 (Thereupon, a short discussion was held off 12 record.)</p> <p>13 (Deposition resumed.)</p> <p>14 THE COURT REPORTER: We're back on the record.</p> <p>15 The time is 10:06 A.M.</p> <p>16 BY MR. DONOVAN:</p> <p>17 Q. Okay. Mr. Adnani, you ready?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. I'm going to refer to the borrowers as 20 the following entities, SPLCSS III, Dorchester 21 receivables II LLC, Insurety Agency Services LLC and 22 Signal SML 4 LLC.</p> <p>23 I'm going to refer to the guarantors as the 24 following entities, 777 Partners LLC and 600 Partners 25 LLC.</p>

<p style="text-align: right;">Page 30</p> <p>01 I'm going to refer to the servicer as</p> <p>02 SuttonPark Servicing LLC and I'm going to refer to the</p> <p>03 sellers as SuttonPark Capital LLC, Signal Medical</p> <p>04 Receivables, LLC and Insurety Capital LLC.</p> <p>05 All of those entities together I'm going to</p> <p>06 refer to as the 777 entity Defendant's, which is how</p> <p>07 those entities are defined in the New York litigation</p> <p>08 between Leadenhall on the one hand and the 777 entity</p> <p>09 Defendant's among other Defendant's on the other hand</p> <p>10 and I'm going to refer to Advantage Capital Holdings,</p> <p>11 LLC as A-CAP.</p> <p>12 All right. Did the 777 entity Defendant's</p> <p>13 pledge collateral to Leadenhall that was not free and</p> <p>14 clear of other claims?</p> <p>15 MR. BOLAND: Object to form.</p> <p>16 A. I'm invoking the fifth.</p> <p>17 BY MR. DONOVAN:</p> <p>18 Q. Did the 777 entity Defendant's pledge</p> <p>19 collateral to Leadenhall that the 777 entity Defendant's</p> <p>20 had already pledged to other lenders?</p> <p>21 MR. BOLAND: Object to form.</p> <p>22 A. I'm invoking the fifth.</p> <p>23 BY MR. DONOVAN:</p> <p>24 Q. Did the 777 entity Defendant's pledge</p> <p>25 collateral to Leadenhall that the 777 entity Defendant's</p>	<p style="text-align: right;">Page 32</p> <p>01 BY MR. DONOVAN:</p> <p>02 Q. Before SuttonPark Capital ever purchased the</p> <p>03 portfolio of assets from JG Wentworth in 2021, did Josh</p> <p>04 Wander and Steven Pasko direct you to issue compliance</p> <p>05 reports to Leadenhall false -- falsely stating that</p> <p>06 assets were pledged to Leadenhall when they were not?</p> <p>07 MR. BOLAND: Object to the form.</p> <p>08 A. I'm invoking the fifth.</p> <p>09 BY MR. DONOVAN:</p> <p>10 Q. Let me ask that question again. Before</p> <p>11 SuttonPark Capital ever purchased the portfolio of</p> <p>12 assets from JG Wentworth in 2021, did Josh Wander and</p> <p>13 Steven Pasko direct you to issue compliance reports to</p> <p>14 Leadenhall, stating that assets had been pledged to</p> <p>15 Leadenhall despite the fact that they had never been</p> <p>16 purchased in the first place?</p> <p>17 MR. BOLAND: Object to form.</p> <p>18 A. I'm invoking the fifth.</p> <p>19 BY MR. DONOVAN:</p> <p>20 Q. Can you confirm that over the May 2021 to</p> <p>21 November 2023 period, you knew that compliance reports</p> <p>22 issued to Leadenhall contain false statements?</p> <p>23 MR. BOLAND: Object to form.</p> <p>24 A. I'm invoking the fifth.</p> <p>25 BY MR. DONOVAN:</p>
<p style="text-align: right;">Page 31</p> <p>01 had not yet purchased?</p> <p>02 MR. BOLAND: Object to the form.</p> <p>03 A. I'm invoking the fifth.</p> <p>04 BY MR. DONOVAN:</p> <p>05 Q. Do you know what JG Wentworth is?</p> <p>06 A. Yes.</p> <p>07 Q. What is JG Wentworth</p> <p>08 A. A wholesale seller of structured settlements,</p> <p>09 I believe, servicer.</p> <p>10 Q. What is a structured settlement?</p> <p>11 A. I am invoking the fifth.</p> <p>12 Q. In 2021, did SuttonPark Capital consider</p> <p>13 purchasing a portfolio of structured settlements from JG</p> <p>14 Wentworth?</p> <p>15 A. I'm invoking the fifth.</p> <p>16 Q. In 2021, did SuttonPark Capital consider</p> <p>17 purchasing a portfolio of structured settlements from JG</p> <p>18 Wentworth worth approximately \$250 million?</p> <p>19 A. I'm invoking the fifth.</p> <p>20 Q. Before SuttonPark Capital ever purchased those</p> <p>21 assets from JG Wentworth, did Josh wander direct you to</p> <p>22 allocate those assets to Leadenhall in the MP Fin</p> <p>23 system?</p> <p>24 MR. BOLAND: Object to the form.</p> <p>25 A. I'm invoking the fifth.</p>	<p style="text-align: right;">Page 33</p> <p>01 Q. Isn't it true that of the \$250 million</p> <p>02 portfolio that SuttonPark Capital considered purchasing</p> <p>03 from JG Wentworth SuttonPark Capital only ultimately</p> <p>04 purchased approximately \$1 million of the portfolio?</p> <p>05 MR. BOLAND: Object to form.</p> <p>06 A. I'm invoking the fifth.</p> <p>07 BY MR. DONOVAN:</p> <p>08 Q. Do you know that members of the SuttonPark</p> <p>09 accounting department have been deposed in this action?</p> <p>10 A. I'm invoking the fifth.</p> <p>11 Q. Do you have any understanding of who the</p> <p>12 accounting department says they expressly raised</p> <p>13 concerns to about assets being pledged to Leadenhall</p> <p>14 that were never actually purchased?</p> <p>15 MR. BOLAND: Object to the form.</p> <p>16 A. I'm invoking the fifth.</p> <p>17 BY MR. DONOVAN:</p> <p>18 Q. Would it surprise you to find out that the</p> <p>19 accounting department at SuttonPark Capital has</p> <p>20 testified under oath that they expressly raised concerns</p> <p>21 to you that assets were pledged to Leadenhall, which</p> <p>22 were never actually purchased?</p> <p>23 MR. BOLAND: Object to the form.</p> <p>24 A. I'm invoking the fifth.</p> <p>25 BY MR. DONOVAN:</p>

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01 Q. Do you remember taking any of those concerns
 02 raised by the accounting department to Josh Wander?
 03 MR. BOLAND: Object to the form.
 04 A. I'm invoking the fifth.
 05 BY MR. DONOVAN:
 06 Q. Did Josh Wonder ever tell you or the
 07 accounting department not to worry about the fact that
 08 assets had been pledged to Leadenhall despite the fact
 09 that they had never been purchased?
 10 MR. BOLAND: Object to the form.
 11 A. Invoking the fifth.
 12 BY MR. DONOVAN:
 13 Q. Do you think Josh Wander is trustworthy?
 14 MR. BOLAND: Object to the form.
 15 A. Invoking the fifth.
 16 BY MR. DONOVAN:
 17 Q. Do you think Josh Wander is a conman?
 18 MR. BOLAND: Object to the form.
 19 A. Invoking the fifth.
 20 BY MR. DONOVAN:
 21 Q. Do you think Steven Pasko is a conman?
 22 MR. BOLAND: Object to the form.
 23 A. Invoking the fifth.
 24 BY MR. DONOVAN:
 25 Q. Did Josh Wander or Steven Pasko ever instruct

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01 you to top up or top off receivables accounts to conceal
 02 the fact that 777 Partners had never purchased assets
 03 that were pledge to Leadenhall?
 04 MR. BOLAND: Object to the form.
 05 A. I'm invoking the fifth.
 06 BY MR. DONOVAN:
 07 Q. Did the 777 entity Defendants pledge
 08 fictitious assets to Leadenhall?
 09 MR. BOLAND: Object to the form.
 10 A. I'm invoking the fifth.
 11 BY MR. DONOVAN:
 12 Q. Did the 777 entity Defendants double pledge
 13 assets to Leadenhall?
 14 MR. BOLAND: Objection.
 15 A. Invoking the fifth.
 16 BY MR. DONOVAN:
 17 Q. Were assets double pledged or fictitiously
 18 pledged to Leadenhall solely because of the actions of
 19 the borrowers or guarantors?
 20 MR. BOLAND: Object to the form.
 21 A. Invoking the fifth.
 22 BY MR. DONOVAN:
 23 Q. Were the 7 -- strike that. Were the 777
 24 entity Defendants A-CAP, Kenneth King, Josh Wander, and
 25 Steven Pasko part of a criminal enterprise?

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01 MR. BOLAND: Object to the form.
 02 A. Invoking fifth.
 03 BY MR. DONOVAN:
 04 Q. Were the 777 entity Defendants A-CAP, Kenneth
 05 King, Josh Wander, and Steven Pasko part of an
 06 association in fact?
 07 A. Invoking the fifth.
 08 BY MR. DONOVAN:
 09 Q. How would you describe a Ponzi scheme?
 10 A. Invoking the fifth.
 11 Q. Did the 777 entity Defendants A-CAP, Kenneth
 12 King, Josh Wander and Steven Pasko operate a Ponzi
 13 scheme?
 14 MR. BOLAND: Object to the form.
 15 A. Invoking fifth.
 16 BY MR. DONOVAN:
 17 Q. Did A-CAP and Kenneth King make the 777 entity
 18 Defendants appear to be a legitimate enterprise when it
 19 was not by loaning billions of dollars to it and making
 20 protective advances?
 21 MR. BOLAND: Object to the form.
 22 A. Invoking fifth.
 23 BY MR. DONOVAN:
 24 Q. Was the common purpose of the association
 25 between the 777 entity Defendants Kenneth King, Josh

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01 Wander and Steven Pasko to generate money for its
 02 members by lying about the security backing lender's
 03 debt.
 04 MR. BOLAND: Object to the form.
 05 A. Invoking the fifth.
 06 BY MR. DONOVAN:
 07 Q. Did A-CAP and Mr. King, control decision
 08 making of the enterprise with the 777 entity Defendants
 09 Josh Wander and Steven Pasko?
 10 MR. BOLAND: Object to the form.
 11 A. Invoking the fifth.
 12 BY MR. DONOVAN:
 13 Q. Was the structure of the criminal enterprise
 14 between 777, the 777 entity Defendants, Kenneth King,
 15 Josh Wander and Steven Pasko memorialized in a steering
 16 committee, memorandum issued around April 2023?
 17 MR. BOLAND: Object to the form.
 18 A. Invoking the fifth.
 19 BY MR. DONOVAN:
 20 Q. When did you stop working in the physical
 21 office space of 777 Partners?
 22 A. Invoking the fifth.
 23 Q. What was the address of 777 Partners former
 24 office building?
 25 A. 600 Brickell Ave.

<p style="text-align: right;">Page 38</p> <p>01 Q. What floor of 600 Brickell Ave did you work 02 on?</p> <p>03 A. The 19th.</p> <p>04 Q. Did you sit in a shared office with Nick 05 Bennett?</p> <p>06 A. Invoking the fifth.</p> <p>07 Q. Did shared offices exist on sorry -- strike 08 that. You said in 19th floor?</p> <p>09 A. Yes.</p> <p>10 Q. Did shared offices exist on the 19th floor of 11 600 Brickell Avenue?</p> <p>12 A. Invoking.</p> <p>13 Q. Were you part of 777 Partners Capital Markets 14 Group?</p> <p>15 A. Invoking the fifth.</p> <p>16 Q. Did the 777 Partners Capital Markets Group 17 work in the same office from the period May 2021 to 18 April 2023, approximately?</p> <p>19 A. Invoking the fifth.</p> <p>20 Q. Did you and Nick Bennett share an office at 21 777 Partners offices from approximately May 2021 to 22 April 2023?</p> <p>23 A. Invoking the fifth.</p> <p>24 Q. Around April 2023, did A-CAP employees Carson 25 McGuffin and Mike Saliab move into your and Nick</p>	<p style="text-align: right;">Page 40</p> <p>01 MR. BOLAND: Object to the form.</p> <p>02 A. Invoking the fifth.</p> <p>03 BY MR. DONOVAN:</p> <p>04 Q. Do you know whether the 777 entity Defendant's 05 A-CAP, Wander, Pasko and King used approximately \$600 06 million in debt provided by Leadenhall to purchase 07 professional football teams?</p> <p>08 MR. BOLAND: Object to the form.</p> <p>09 A. Invoking fifth.</p> <p>10 BY MR. DONOVAN:</p> <p>11 Q. Did the 777 entity Defendants A-CAP, Wander, 12 Pasko and King use \$100 million in debt provided by 13 Leadenhall to purchase or try to purchase football teams 14 and airlines?</p> <p>15 MR. BOLAND: Object to the form.</p> <p>16 A. Invoking fifth.</p> <p>17 BY MR. DONOVAN:</p> <p>18 Q. Did you play any role in 777 Partners attempt 19 to purchase Everton?</p> <p>20 A. Invoking the fifth.</p> <p>21 Q. Did the 777 entity Defendants issue false 22 compliance reports to Leadenhall over the May 2021 to 23 November 2023 period.</p> <p>24 MR. BOLAND: Object to the form.</p> <p>25 A. Invoking the fifth.</p>
<p style="text-align: right;">Page 39</p> <p>01 Bennett's offices at 777 Partners offices?</p> <p>02 MR. BOLAND: Object to the form.</p> <p>03 A. Invoking the fifth.</p> <p>04 BY MR. DONOVAN:</p> <p>05 Q. Would you agree with me that Kenneth King and 06 A-CAP exercised total control over the 777 entity 07 Defendants?</p> <p>08 MR. BOLAND: Object to the form.</p> <p>09 A. Invoking the fifth.</p> <p>10 BY MR. DONOVAN:</p> <p>11 Q. Would you agree with me that A-CAP and Kenneth 12 King determined whether the 777 entity Defendants could 13 make payroll and enter into contracts?</p> <p>14 MR. BOLAND: Object to the form.</p> <p>15 A. Invoking the fifth.</p> <p>16 BY MR. DONOVAN:</p> <p>17 Q. Did Kenneth King and A-CAP sit at the top of 18 the hierarchy in the criminal enterprise with the 777 19 entity Defendants Josh Wander and Steven Pasko?</p> <p>20 MR. BOLAND: Object to the form.</p> <p>21 A. Invoking fifth.</p> <p>22 BY MR. DONOVAN:</p> <p>23 Q. Did Kenneth King control two different 24 organizations that exist the defraud lenders Number one, 25 A-CAP and Number two the 777 entity Defendants?</p>	<p style="text-align: right;">Page 41</p> <p>01 BY MR. DONOVAN:</p> <p>02 Q. What's your understanding of a compliance 03 report?</p> <p>04 A. Invoking the fifth.</p> <p>05 Q. Do you understand that a compliance report 06 contains list of assets, purportedly pledged exclusively 07 to a lender?</p> <p>08 MR. BOLAND: Object to the form.</p> <p>09 A. Invoking the fifth.</p> <p>10 BY MR. DONOVAN:</p> <p>11 Q. Did the 777 entity Defendants issue 12 approximately 60 false monthly compliance reports to 13 Leadenhall?</p> <p>14 MR. BOLAND: Objection.</p> <p>15 A. Invoking fifth.</p> <p>16 BY MR. DONOVAN:</p> <p>17 Q. Were the compliance reports false because they 18 contained lists of assets extensively pledged 19 exclusively to Leadenhall, which were either double 20 pledged or which were never purchased in the first 21 place?</p> <p>22 MR. BOLAND: Object to the form.</p> <p>23 A. Invoking the fifth.</p> <p>24 BY MR. DONOVAN:</p> <p>25 Q. Did the 777 entity Defendants A-CAP, Kenneth</p>

<p style="text-align: right;">Page 42</p> <p>01 King, Josh Wander and Steven Pasko participate in the</p> <p>02 scheme to issue compliance reports to Leadenhall from</p> <p>03 May 2021 to November 2023 falsely stating that assets</p> <p>04 were pledged exclusively to Leadenhall and they were</p> <p>05 not?</p> <p>06 MR. BOLAND: Object to the form.</p> <p>07 A. Invoking fifth.</p> <p>08 BY MR. DONOVAN:</p> <p>09 Q. Did that criminal enterprise work together to</p> <p>10 issue false compliance reports to Leadenhall over the</p> <p>11 May 2021 to November 2023?</p> <p>12 MR. BOLAND: Object to the form.</p> <p>13 A. Invoking the fifth.</p> <p>14 BY MR. DONOVAN:</p> <p>15 Q. Do you remember, preparing restated compliance</p> <p>16 reports for Leadenhall around the January 2024 period?</p> <p>17 A. Invoking the fifth.</p> <p>18 Q. And did those restated compliance reports</p> <p>19 issued in January 2024 show that going back to March</p> <p>20 2023, the 777 entity Defendants had double pledged or</p> <p>21 fictitiously pledged approximately \$350 million in</p> <p>22 collateral to Leadenhall?</p> <p>23 MR. BOLAND: Object to the form.</p> <p>24 A. Invoking the fifth.</p> <p>25 BY MR. DONOVAN:</p>	<p style="text-align: right;">Page 44</p> <p>01 Q. Did Kenneth King knowingly issue false</p> <p>02 compliance reports to Leadenhall from May 2021 to</p> <p>03 November 2023?</p> <p>04 MR. BOLAND: Object to the form.</p> <p>05 A. Invoking the fifth.</p> <p>06 BY MR. DONOVAN:</p> <p>07 Q. Did the enterprise between the 777 entity</p> <p>08 Defendants in A-CAP issue forged or photo-shopped bank</p> <p>09 statements to Leadenhall to show that money was in bank</p> <p>10 accounts when it was not in those accounts?</p> <p>11 MR. BOLAND: Object to the form.</p> <p>12 A. Invoking the fifth.</p> <p>13 BY MR. DONOVAN:</p> <p>14 Q. Did the 777 entity Defendants alter</p> <p>15 receivables in the 777 Partners computer system called</p> <p>16 MP FIN to make it appear as though assets had been</p> <p>17 pledged exclusively to Leadenhall when they had not?</p> <p>18 MR. BOLAND: Object to the form.</p> <p>19 A. Invoking the fifth.</p> <p>20 BY MR. DONOVAN:</p> <p>21 Q. Do you know whether A-CAP and the 777 entity</p> <p>22 Defendants engaged in sham or restructuring negotiations</p> <p>23 with Leadenhall in 2024 to avoid bringing defraud to</p> <p>24 light?</p> <p>25 MR. BOLAND: Object to the form.</p>
<p style="text-align: right;">Page 43</p> <p>01 Q. When I use the term knowingly, I mean</p> <p>02 intentionally and deliberately and not by mistake. Did</p> <p>03 the 777 entity Defendants knowingly issue false</p> <p>04 compliance reports to Leadenhall from May 2021 to</p> <p>05 November 2023?</p> <p>06 MR. BOLAND: Object to the form.</p> <p>07 A. Invoking fifth.</p> <p>08 BY MR. DONOVAN:</p> <p>09 Q. Did Josh Wander knowingly issue false</p> <p>10 compliance reports to Leadenhall from May 2021 to</p> <p>11 November 2023?</p> <p>12 MR. BOLAND: Object to the form.</p> <p>13 A. Invoking the fifth.</p> <p>14 BY MR. DONOVAN:</p> <p>15 Q. Did Steven Pasko knowingly issue false</p> <p>16 compliance reports to Leadenhall from May 2021 to</p> <p>17 November 2023?</p> <p>18 MR. BOLAND: Object to the form.</p> <p>19 A. Invoking fifth.</p> <p>20 BY MR. DONOVAN:</p> <p>21 Q. Did A-CAP knowingly issue false compliance</p> <p>22 reports to Leadenhall from May 2021, November 2023?</p> <p>23 MR. BOLAND: Object to the form.</p> <p>24 A. Invoking fifth.</p> <p>25 BY MR. DONOVAN:</p>	<p style="text-align: right;">Page 45</p> <p>01 A. Invoking the fifth.</p> <p>02 BY MR. DONOVAN:</p> <p>03 Q. Do you know whether the 777 entity Defendants</p> <p>04 recorded in servicing notes in 777 Partners computer</p> <p>05 system that assets had been double pledged to</p> <p>06 Leadenhall?</p> <p>07 MR. BOLAND: Object to the form.</p> <p>08 A. Invoking the fifth.</p> <p>09 BY MR. DONOVAN:</p> <p>10 Q. Did the 777 entity Defendants knowingly double</p> <p>11 pledge assets to Leadenhall?</p> <p>12 MR. BOLAND: Object to the form.</p> <p>13 A. Invoking the fifth.</p> <p>14 BY MR. DONOVAN:</p> <p>15 Q. Did the 777 entity Defendants knowingly pledge</p> <p>16 assets to Leadenhall that had never been purchased in</p> <p>17 the first place?</p> <p>18 MR. BOLAND: Object to the form.</p> <p>19 A. Invoking the fifth.</p> <p>20 BY MR. DONOVAN:</p> <p>21 Q. Did A-CAP and Kenneth King knowingly double</p> <p>22 pledge assets to Leadenhall?</p> <p>23 MR. BOLAND: Object to the form.</p> <p>24 A. Invoking fifth.</p> <p>25 BY MR. DONOVAN:</p>

<p style="text-align: right;">Page 46</p> <p>01 Q. Did A-CAP and Kenneth King knowingly pledge</p> <p>02 assets to Leadenhall that had never been purchased in</p> <p>03 the first place?</p> <p>04 MR. BOLAND: Object to the form.</p> <p>05 A. Invoking the fifth.</p> <p>06 BY MR. DONOVAN:</p> <p>07 Q. Did the 777 entity Defendants operating at the</p> <p>08 direction of Kenneth King, Josh Wander, Steven Pasko and</p> <p>09 A-CAP create fake records in 777 Partners computer</p> <p>10 system -- systems to give the appearance that assets had</p> <p>11 been pledged to Leadenhall?</p> <p>12 MR. BOLAND: Object to the form.</p> <p>13 A. Invoking the fifth.</p> <p>14 BY MR. DONOVAN:</p> <p>15 Q. Did the 777 entity Defendants A-CAP, Kenneth</p> <p>16 King, Josh Wander, and Steven Pasko attempt to stop</p> <p>17 Leadenhall from conducting an audit of its collateral</p> <p>18 because it knew that an audit would show that assets had</p> <p>19 been double pledged or fictitiously pledged?</p> <p>20 MR. BOLAND: Object to the form.</p> <p>21 A. Invoking the fifth.</p> <p>22 BY MR. DONOVAN:</p> <p>23 Q. Around March 2023, did A-CAP employees move</p> <p>24 into your and Nick Bennett's offices?</p> <p>25 A. Invoking the fifth.</p>	<p style="text-align: right;">Page 48</p> <p>01 MR. BOLAND: Object to the form.</p> <p>02 A. Invoking fifth.</p> <p>03 BY MR. DONOVAN:</p> <p>04 Q. Do you remember Josh Wander and Steven Pasko</p> <p>05 resigning as managers of 777 Partners and 600 Partners</p> <p>06 in May 2024?</p> <p>07 A. Invoking.</p> <p>08 Q. Sorry, invoking the fifth, right?</p> <p>09 A. Invoking fifth.</p> <p>10 Q. Yeah.</p> <p>11 A. Sorry.</p> <p>12 Q. Do you want a drink of water or no?</p> <p>13 A. I got.</p> <p>14 Q. Okay.</p> <p>15 A. Thank you.</p> <p>16 Q. Do -- withdrawn. Did 777 Partners and 600</p> <p>17 Partners operate as one single entity over the May 2021</p> <p>18 to May 2024 period?</p> <p>19 MR. BOLAND: Object to the form.</p> <p>20 A. Invoking fifth.</p> <p>21 BY MR. DONOVAN:</p> <p>22 Q. Is it fair to say there's no distinction</p> <p>23 whatsoever between 777 Partners and 600 Partners prior</p> <p>24 to May 2024?</p> <p>25 MR. BOLAND: Object to the form.</p>
<p style="text-align: right;">Page 47</p> <p>01 Q. Around March 2023, did you and Nick Bennett</p> <p>02 begin reporting directly to A-CAP employees Mike Saliab</p> <p>03 and Carson McGuffin?</p> <p>04 A. Invoking fifth.</p> <p>05 Q. Did A-CAP employees Carson McGuffin and Mike</p> <p>06 Saliab direct you to continue to issue false compliance</p> <p>07 reports to Leadenhall from the March 2023 to November</p> <p>08 2023 period?</p> <p>09 MR. BOLAND: Object to the form.</p> <p>10 A. Invoking fifth.</p> <p>11 BY MR. DONOVAN:</p> <p>12 Q. Prior to moving into 777 Partners offices in</p> <p>13 March 2023, did A-CAP know that the 777 entity</p> <p>14 Defendants were issuing false compliance reports to</p> <p>15 Leadenhall?</p> <p>16 MR. BOLAND: Object to the form.</p> <p>17 A. Invoking fifth.</p> <p>18 BY MR. DONOVAN:</p> <p>19 Q. Who at 777 Partners would know the most about</p> <p>20 compliance reports issued to Leadenhall?</p> <p>21 A. Invoking fifth.</p> <p>22 Q. Would it surprise you to find out that other</p> <p>23 employees have testified that you and Nick Bennett would</p> <p>24 know the most about compliance reports issued to</p> <p>25 Leadenhall?</p>	<p style="text-align: right;">Page 49</p> <p>01 A. Invoking fifth.</p> <p>02 BY MR. DONOVAN:</p> <p>03 Q. Prior to May 2024, did Josh Wander and Steven</p> <p>04 Pasko exercise complete dominion in control over 777</p> <p>05 Partners and 600 Partners?</p> <p>06 MR. BOLAND: Object to the form.</p> <p>07 A. Invoking fifth.</p> <p>08 BY MR. DONOVAN:</p> <p>09 Q. Prior to May 2024, were 777 Partners and 600</p> <p>10 Partners mere instrumentalities of Josh Wander, Steven</p> <p>11 Pasko and Kenneth King?</p> <p>12 MR. BOLAND: Object to the form.</p> <p>13 A. Invoking fifth.</p> <p>14 BY MR. DONOVAN:</p> <p>15 Q. Did Josh Wander, Steven Pasko and Kenneth King</p> <p>16 use 777 Partners and 600 Partners as instrumentalities</p> <p>17 to defraud Leadenhall?</p> <p>18 MR. BOLAND: Object to the form.</p> <p>19 A. Invoking the fifth.</p> <p>20 BY MR. DONOVAN:</p> <p>21 Q. Did the fraud perpetrated by Wander and Pasko</p> <p>22 through 777 Partners and 600 Partners result in a loss</p> <p>23 to Leadenhall?</p> <p>24 MR. BOLAND: Object to the form.</p> <p>25 A. Invoking fifth.</p>

<p style="text-align: right;">Page 50</p> <p>01 BY MR. DONOVAN:</p> <p>02 Q. What's your understanding of the word</p> <p>03 insolvent?</p> <p>04 A. Going to invoke the fifth.</p> <p>05 Q. So, when I use the term insolvents, what I</p> <p>06 mean is that the 777 entity Defendants could not meet</p> <p>07 their debts and financial obligations as they became</p> <p>08 due.</p> <p>09 So, did there come a time when the 777 entity</p> <p>10 Defendants became insolvent?</p> <p>11 MR. BOLAND: Object to the form.</p> <p>12 A. I'm invoking fifth.</p> <p>13 BY MR. DONOVAN:</p> <p>14 Q. Is it fair to say that but for loans and</p> <p>15 protective advances provided by A-CAP, the 777 entity</p> <p>16 Defendants were insolvent over the May 2021 to May 2024</p> <p>17 period?</p> <p>18 MR. BOLAND: Object to the form.</p> <p>19 A. Invoking the fifth.</p> <p>20 BY MR. DONOVAN:</p> <p>21 Q. Did Josh Wander and Steven Pasko use the</p> <p>22 corporate funds of 777 Partners and 600 Partners for</p> <p>23 personal use?</p> <p>24 MR. BOLAND: Object to the form.</p> <p>25 A. Invoking fifth.</p>	<p style="text-align: right;">Page 52</p> <p>01 Q. Did 777 Partners, 600 Partners, Josh Wander</p> <p>02 and Steven Pasko, co-mingle corporate and professional</p> <p>03 -- sorry, withdrawn. Let me start again.</p> <p>04 Did 777 Partners, 600 Partners, Josh Wander</p> <p>05 and Steven Pasko, co-mingle corporate and personal</p> <p>06 funds?</p> <p>07 MR. BOLAND: Object to the form.</p> <p>08 A. Invoking fifth.</p> <p>09 BY MR. DONOVAN:</p> <p>10 Q. Were 777 Partners and 600 Partners operating</p> <p>11 as one single profit center?</p> <p>12 MR. BOLAND: Object to the form.</p> <p>13 A. Invoking fifth.</p> <p>14 BY MR. DONOVAN:</p> <p>15 Q. Did 777 Partners and 600 Partners hold regular</p> <p>16 board meetings?</p> <p>17 MR. BOLAND: Objection.</p> <p>18 A. Invoking fifth.</p> <p>19 BY MR. DONOVAN:</p> <p>20 Q. Isn't it true that 777 Partners and 600</p> <p>21 Partners stopped holding regular board meetings around</p> <p>22 the latter half of 2022?</p> <p>23 MR. BOLAND: Object to the form.</p> <p>24 A. Invoking the fifth.</p> <p>25 BY MR. DONOVAN:</p>
<p style="text-align: right;">Page 51</p> <p>01 BY MR. DONOVAN:</p> <p>02 Q. Did Josh Wander and Steven Pasko use a</p> <p>03 corporate jet of 777 Partners and 600 Partners for</p> <p>04 personal use?</p> <p>05 MR. BOLAND: Object to the form.</p> <p>06 A. Invoking fifth.</p> <p>07 BY MR. DONOVAN:</p> <p>08 Q. Can you confirm that there was an overlap in</p> <p>09 ownership officers, directors and personnel between 777</p> <p>10 Partners and 600 Partners?</p> <p>11 MR. BOLAND: Object to the form.</p> <p>12 A. Invoking fifth.</p> <p>13 BY MR. DONOVAN:</p> <p>14 Q. Can you confirm that 777 Partners and 600</p> <p>15 Partners, had common office space addresses e-mail</p> <p>16 addresses and telephone numbers?</p> <p>17 MR. BOLAND: Object to the form.</p> <p>18 A. Invoking fifth.</p> <p>19 BY MR. DONOVAN:</p> <p>20 Q. Can you confirm that 777 Partners, 600</p> <p>21 Partners and other entities within the 777 system did</p> <p>22 not transact with each other at arm's length?</p> <p>23 MR. BOLAND: Object to the form.</p> <p>24 A. Invoking fifth.</p> <p>25 BY MR. DONOVAN:</p>	<p style="text-align: right;">Page 53</p> <p>01 Q. Did 777 Partners and 600 Partners cease</p> <p>02 holding regular board meetings because A-CAP had</p> <p>03 exercised further control over the enterprise around the</p> <p>04 period late 2022 to early 2023?</p> <p>05 MR. BOLAND: Object to the form.</p> <p>06 A. Invoking fifth.</p> <p>07 BY MR. DONOVAN:</p> <p>08 Q. Did 777 Partners and 600 Partners exercise any</p> <p>09 corporate formalities?</p> <p>10 MR. BOLAND: Object to the form.</p> <p>11 A. How do you mean? Can you repeat that?</p> <p>12 BY MR. DONOVAN:</p> <p>13 Q. Sure. Did 777 Partners and 600 Partners</p> <p>14 exercise any corporate formalities?</p> <p>15 MR. BOLAND: Object to the form.</p> <p>16 A. Invoking fifth.</p> <p>17 BY MR. DONOVAN:</p> <p>18 Q. Do you understand, what I mean by corporate</p> <p>19 formalities?</p> <p>20 A. I believe I have an idea.</p> <p>21 Q. What's your idea?</p> <p>22 A. Well, I think it would be beneficial for you</p> <p>23 to elaborate.</p> <p>24 Q. Sure. So, when I use the term corporate</p> <p>25 formalities, I mean things like regular board meetings,</p>

<p style="text-align: right;">Page 54</p> <p>01 minutes taken at board meetings, specifically delineated</p> <p>02 roles between officers and managers formal annualized or</p> <p>03 regular reporting things like that.</p> <p>04 Fair?</p> <p>05 A. Understood.</p> <p>06 Q. Okay. Did 777 Partners and 600 Partners</p> <p>07 exercise corporate formalities?</p> <p>08 MR. BOLAND: Object to the form.</p> <p>09 A. I'm going to exercise the fifth.</p> <p>10 BY MR. DONOVAN:</p> <p>11 Q. Did the 777 entity Defendants routinely</p> <p>12 guarantee the debt or debt obligations of other</p> <p>13 affiliates within the 777 corporate system?</p> <p>14 MR. BOLAND: Object to the form.</p> <p>15 A. I'm going to invoke the fifth.</p> <p>16 BY MR. DONOVAN:</p> <p>17 Q. Did Josh Wander and Steven Pasko routinely</p> <p>18 guarantee the debt on a personal basis of other entities</p> <p>19 within the 777 Partners corporate system?</p> <p>20 MR. BOLAND: Object to the form.</p> <p>21 A. Invoking fifth.</p> <p>22 BY MR. DONOVAN:</p> <p>23 Q. Is 600 Partners a shell corporate entity which</p> <p>24 exists solely to funnel money up to Steven Pasko?</p> <p>25 MR. BOLAND: Object to the form.</p>	<p style="text-align: right;">Page 56</p> <p>01 document to a shared drive and you tell one of your</p> <p>02 colleagues "Hey, I'm going to save this document to the</p> <p>03 shared drive," what do you call that shared drive or</p> <p>04 network folder?</p> <p>05 MR. BOLAND: Object to the form.</p> <p>06 A. It would depend on the company.</p> <p>07 BY MR. DONOVAN:</p> <p>08 Q. When you refer to the company, are you</p> <p>09 referring to companies within the 777 system or lenders?</p> <p>10 MR. BOLAND: Object to the form.</p> <p>11 A. Within the 777 system.</p> <p>12 BY MR. DONOVAN:</p> <p>13 Q. Fair. So, for 777 Partners specifically, is</p> <p>14 there a shared drive where employees can save and access</p> <p>15 documents collectively?</p> <p>16 A. Yes. Yes.</p> <p>17 Q. What do employees call that, shared drive or</p> <p>18 network folder?</p> <p>19 MR. BOLAND: Object to the form.</p> <p>20 A. Again, there were several, so you would have</p> <p>21 to be more specific.</p> <p>22 BY MR. DONOVAN:</p> <p>23 Q. Can you name for me, the several that you</p> <p>24 remember?</p> <p>25 A. I believe SharePoint or Dropbox were among the</p>
<p style="text-align: right;">Page 55</p> <p>01 A. Invoking fifth.</p> <p>02 BY MR. DONOVAN:</p> <p>03 Q. Do you know whether the 777 entity Defendants</p> <p>04 maintain any corporate records?</p> <p>05 MR. BOLAND: Object to the form.</p> <p>06 A. Invoking fifth.</p> <p>07 BY MR. DONOVAN:</p> <p>08 Q. Does triple -- sorry, withdrawn. Did 777</p> <p>09 Partners have a shared drive or a network folder where</p> <p>10 documents were saved?</p> <p>11 A. I believe so.</p> <p>12 Q. You remember what was -- sorry. Do you</p> <p>13 remember what it was called?</p> <p>14 A. For what specifically, I believe, there were</p> <p>15 several.</p> <p>16 Q. Sure. So, you testified that 777 Partners has</p> <p>17 a shared folder or a network drive where team members</p> <p>18 can share and access documents, right?</p> <p>19 A. Yes.</p> <p>20 Q. Does that shared folder or network drive go by</p> <p>21 a name by 777 Partners employees?</p> <p>22 MR. BOLAND: Object to the form.</p> <p>23 A. I am going to invoke the fifth.</p> <p>24 BY MR. DONOVAN:</p> <p>25 Q. Well, I'm just asking if you have to save a</p>	<p style="text-align: right;">Page 57</p> <p>01 few that I recall.</p> <p>02 Q. Do they have specific names or do you just</p> <p>03 call them SharePoint or Dropbox?</p> <p>04 A. In regard to what?</p> <p>05 Q. So, I'll give you an example. I work at a law</p> <p>06 firm and when we have to save documents, we say things</p> <p>07 like, can you save it to the Z Drive or can you save it</p> <p>08 to the 777 Partners system within the Z Drive or</p> <p>09 something like that.</p> <p>10 Do employees refer to specific folders where</p> <p>11 they saved documents in that manner or no?</p> <p>12 MR. BOLAND: Object to the form.</p> <p>13 A. For me personally or other?</p> <p>14 BY MR. DONOVAN:</p> <p>15 Q. Oh yeah, sure. Let's start with you</p> <p>16 personally. Like if you were going to save a document</p> <p>17 so that others could access the document within a shared</p> <p>18 folder or network drive.</p> <p>19 How would you describe the name of the</p> <p>20 SharePoint or the Dropbox or the share folder in which</p> <p>21 you are saving the document?</p> <p>22 A. You would say the name of -- well, I would</p> <p>23 assume you would say the name of which you saved it to.</p> <p>24 Q. I see. So, would you say like, I'm going to</p> <p>25 save this to the 777 Partner SharePoint?</p>

<p style="text-align: right;">Page 58</p> <p>01 A. I am not sure specifically; I would assume 02 several different ways of articulating the location of 03 any sort of file depending on the company. 04 Q. Sure. So, I'm just asking for 777 Partners 05 specifically. What are the folder or network drive 06 names for employee saved documents? 07 A. Again, there's quite a few portfolio 08 companies, so it's difficult to answer that question 09 specifically. 10 Q. I see. So, is it fair to say that folders on 11 the SharePoint or Dropbox are organized by Portfolio 12 Company? 13 MR. BOLAND: Object to the form. 14 A. I'm not sure, how to answer that. 15 BY MR. DONOVAN: 16 Q. Well, so triple -- were you going to -- sorry, 17 I didn't mean to cut you off there. 18 A. No, no, go ahead. 19 Q. 777 Partners LLC is not a portfolio company, 20 right? 21 A. No. 22 Q. Would you describe it, as a holding company? 23 MR. BOLAND: Object to the form. 24 A. I would. 25 BY MR. DONOVAN:</p>	<p style="text-align: right;">Page 60</p> <p>01 A. I'm going to invoke the fifth. 02 BY MR. DONOVAN: 03 Q. Has anyone ever instructed you to delete 04 documents? 05 A. I'm going to invoke the fifth. 06 Q. Let me try it again. Has anyone during your 07 employment at 777 Partners instructed you to delete 08 documents? 09 MR. BOLAND: Object to the form. 10 A. I'm going to invoke the fifth. 11 BY MR. DONOVAN: 12 Q. Has anyone at 777 Partners instructed you to 13 delete documents concerning Leadenhall? 14 MR. BOLAND: Object to the form. 15 A. I'm going to invoke the fifth. 16 BY MR. DONOVAN: 17 Q. Has anyone at 777 Partners instructed you to 18 not leave a paper trail for communications involving 19 Leadenhall? 20 MR. BOLAND: Object to the form. 21 A. I'm going to invoke the fifth. 22 BY MR. DONOVAN: 23 Q. Do you know, whether Josh Wander communicated 24 with you and Nick Bennett over FaceTime because he was 25 concerned about leaving a paper trail of fraud?</p>
<p style="text-align: right;">Page 59</p> <p>01 Q. So, I'm asking for documents concerning the 02 777 Partners holding company. 03 What is the name of the shared folder or 04 network drive in which you saved documents apart from 05 the portfolio companies? 06 MR. BOLAND: Object to the form. 07 A. Again, it's difficult to answer that I'm not 08 sure, there were several and it would depend on the 09 instance. 10 BY MR. DONOVAN: 11 Q. Well, so if I were looking for documents on 12 the shared drive which concerned Leadenhall, where would 13 I look? 14 A. I'm going to invoke the fifth. 15 Q. Is there a folder on the 777 Partners shared 16 network or shared folder named or otherwise referring to 17 Leadenhall? 18 MR. BOLAND: Object to the form. 19 A. I'm going to invoke the fifth. 20 BY MR. DONOVAN: 21 Q. Do you know how often the MP FIN system -- 22 sorry, strike that. 23 Have you ever received a document preservation 24 notice concerning the Leadenhall lawsuits? 25 MR. BOLAND: Object to the form.</p>	<p style="text-align: right;">Page 61</p> <p>01 MR. BOLAND: Object to the form. 02 A. I'm going to invoke the fifth. 03 BY MR. DONOVAN: 04 Q. Around the period March 2023, did A-CAP 05 representatives, Kenneth King, Mike Saliab and Carson 06 McGuffin start listening in on your phone calls? 07 MR. BOLAND: Object to the form. 08 A. I'm going to invoke the fifth. 09 BY MR. DONOVAN: 10 Q. Did Josh Wander and Steven Pasko use 777 11 Partners and 600 Partners as trade names to take in 12 money from lenders under false pretenses and shuffle it 13 around to various money losing entities? 14 MR. BOLAND: Object to the form. 15 A. Invoking fifth. 16 BY MR. DONOVAN: 17 Q. Did A-CAP and King control the guarantors 18 every move in inducing Leadenhall to provide over \$600 19 million in debt funding to the 777 entity Defendants? 20 A. Invoking fifth. 21 Q. Did A-CAP, the 777 entity Defendants Wander, 22 Pasko and King defraud Leadenhall out of approximately 23 \$600 million and shuffle it around to various money 24 losing shell entities? 25 MR. BOLAND: Object to the form.</p>

<p style="text-align: right;">Page 62</p> <p>01 A. Invoking fifth.</p> <p>02 BY MR. DONOVAN:</p> <p>03 Q. Did A-CAP, the 777 entity Defendants Wander,</p> <p>04 Pasko and King use money drawn from Leadenhall to make</p> <p>05 risky bets on professional football teams, airlines and</p> <p>06 luxury condos?</p> <p>07 MR. BOLAND: Object to the form.</p> <p>08 A. Invoking fifth.</p> <p>09 MR. DONOVAN: Can we take a 5-minute break?</p> <p>10 THE WITNESS: Sure.</p> <p>11 THE COURT REPORTER: We're going off record.</p> <p>12 The time is 10:58 A.M.</p> <p>13 (Thereupon, a short discussion was held off</p> <p>14 record.)</p> <p>15 (Deposition resumed.)</p> <p>16 THE COURT REPORTER: We are back on the</p> <p>17 record. The time is 11:15 A.M.</p> <p>18 BY MR. DONOVAN:</p> <p>19 Q. All right. Mr. Adnani, you ready?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Did the Plaintiffs in this Florida</p> <p>22 action, file the action solely to retaliate against</p> <p>23 Leadenhall for bringing the New York Action?</p> <p>24 MR. BOLAND: Object to form.</p> <p>25 A. Invoking fifth.</p>	<p style="text-align: right;">Page 64</p> <p>01 A. Invoking the fifth.</p> <p>02 Q. Have you testified before a grand Jury?</p> <p>03 A. Invoking the fifth.</p> <p>04 Q. Have you provided information to the</p> <p>05 Department of Justice concerning 777 Partners?</p> <p>06 A. Invoking the fifth.</p> <p>07 Q. Do you know, whether Noah Davis has been asked</p> <p>08 to testify before a grand Jury?</p> <p>09 MR. BOLAND: Object to the form.</p> <p>10 A. Invoking fifth.</p> <p>11 BY MR. DONOVAN:</p> <p>12 Q. Do you know that right before Noah Davis</p> <p>13 conducted his first intrusion into 777 Partners computer</p> <p>14 systems, he had received a grand Jury subpoena asking</p> <p>15 for information to that?</p> <p>16 MR. BOLAND: Object to the form.</p> <p>17 A. Invoking the fifth.</p> <p>18 BY MR. DONOVAN:</p> <p>19 Q. Do you have any evidence or factual basis</p> <p>20 whatsoever to believe that Leadenhall played any role in</p> <p>21 Noah Davis conducting unauthorized intrusions in the 777</p> <p>22 Partners computer systems or office buildings?</p> <p>23 MR. BOLAND: Object to the form.</p> <p>24 A. Invoking fifth.</p> <p>25 MR. DONOVAN: All right. I'm going to pass</p>
<p style="text-align: right;">Page 63</p> <p>01 BY MR. DONOVAN:</p> <p>02 Q. Did the Plaintiffs in this Florida action file</p> <p>03 the action solely to get even with Leadenhall because</p> <p>04 Leadenhall filed a New York action?</p> <p>05 MR. BOLAND: Object to the form.</p> <p>06 A. Invoking fifth.</p> <p>07 THE COURT REPORTER: Mr. Boland, can you speak</p> <p>08 a little bit louder? I apologize. It's very</p> <p>09 feeble.</p> <p>10 MR. BOLAND: Yeah, it was object to the form.</p> <p>11 I try not to interrupt the question if I can.</p> <p>12 THE COURT REPORTER: Thank you.</p> <p>13 THE WITNESS: You can hear me?</p> <p>14 THE COURT REPORTER: Yes, I can hear you.</p> <p>15 THE WITNESS: Okay.</p> <p>16 BY MR. DONOVAN:</p> <p>17 Q. Did Plaintiffs file the Florida action in bad</p> <p>18 faith for the sole purpose of trying to injure</p> <p>19 Leadenhall?</p> <p>20 MR. BOLAND: Object to the form.</p> <p>21 A. Invoking fifth.</p> <p>22 BY MR. DONOVAN:</p> <p>23 Q. Do you know that 777 Partners is currently the</p> <p>24 subject of an investigation by the Department of</p> <p>25 Justice?</p>	<p style="text-align: right;">Page 65</p> <p>01 the witness, Mr. Morlan. Thank you.</p> <p>02 THE WITNESS: Thank you.</p> <p>03 DIRECT EXAMINATION</p> <p>04 BY MR. MORLAN III:</p> <p>05 Q. Good morning, Mr. Adnani. My name is Harold</p> <p>06 Morlan. I represent Paul Kosinski and Saiph Consulting</p> <p>07 LLC in this action.</p> <p>08 Have you ever heard of Saiph Consulting LLC</p> <p>09 before?</p> <p>10 A. I have heard of them.</p> <p>11 Q. And have you ever heard of Paul Kosinski</p> <p>12 before?</p> <p>13 A. Yes.</p> <p>14 Q. And how did you first become familiar with</p> <p>15 Saiph Consulting LLC?</p> <p>16 A. I don't recall specifically.</p> <p>17 Q. What do you know about Saiph Consulting LLC?</p> <p>18 MR. BOLAND: Object to the form.</p> <p>19 A. They provide a consulting service for</p> <p>20 different financial needs I believe, but I'm not 100%</p> <p>21 certain exactly the extent of their business.</p> <p>22 BY MR. MORLAN III:</p> <p>23 Q. And when I say the collateral audit that's at</p> <p>24 issue in this litigation, do you know what I'm referring</p> <p>25 to?</p>

<p style="text-align: right;">Page 66</p> <p>01 A. I'm invoking fifth.</p> <p>02 Q. Is it your understanding that Leadenhall</p> <p>03 retained a Saiph Consulting LLC, to perform an audit of</p> <p>04 the collateral that was pledged or to be pledged to</p> <p>05 Leadenhall in the connection -- in connection with</p> <p>06 certain credit facilities?</p> <p>07 A. I'm going to invoke the fifth.</p> <p>08 Q. How long have you worked for 777 Partners?</p> <p>09 A. Roughly seven years, I believe.</p> <p>10 MR. BOLAND: Object to the form.</p> <p>11 BY MR. MORLAN III:</p> <p>12 Q. And what was your title when you started</p> <p>13 working there?</p> <p>14 A. I'm going to invoke the fifth.</p> <p>15 Q. And can you walk me through the history of</p> <p>16 your, the various positions you've held at 777 Partners,</p> <p>17 since you began working there approximately seven years</p> <p>18 ago?</p> <p>19 A. I am going to invoke the fifth.</p> <p>20 Q. Did you know Paul Kosinski when he worked for</p> <p>21 SuttonPark Capital?</p> <p>22 A. Yes.</p> <p>23 Q. Did you have occasion to work with,</p> <p>24 Mr. Kosinski back then?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 68</p> <p>01 disagreements that you can recall, prior to his</p> <p>02 departure from SuttonPark Capital?</p> <p>03 A. Going to invoke the fifth.</p> <p>04 Q. Have you ever heard anybody make any</p> <p>05 disparaging remarks about Mr. Kosinski?</p> <p>06 A. Going to invoke the fifth.</p> <p>07 Q. Do you feel like you've spent enough time</p> <p>08 working with Mr. Kosinski prior to his departure in late</p> <p>09 2020 to have insights into his professional reputation?</p> <p>10 MR. BOLAND: Object to form.</p> <p>11 A. Going to invoke the fifth.</p> <p>12 BY MR. MORLAN, III:</p> <p>13 Q. Do you feel like you worked with Mr. Kosinski</p> <p>14 prior to his departure in 2020 enough to have insights</p> <p>15 into his character as would pertain to his business</p> <p>16 activities?</p> <p>17 MR. BOLAND: Object to form.</p> <p>18 A. I'm going to invoke the fifth.</p> <p>19 BY MR. MORLAN, III:</p> <p>20 Q. Are you aware of any allegations of</p> <p>21 impropriety against Paul Kosinski?</p> <p>22 A. I'm going to invoke the fifth.</p> <p>23 Q. Are you aware of the allegations against</p> <p>24 Mr. Kosinski and Saiph Consulting in the lawsuit for</p> <p>25 which your deposition is being taken today?</p>
<p style="text-align: right;">Page 67</p> <p>01 Q. And did you work with Mr. Kosinski enough such</p> <p>02 that you would have insight into his character?</p> <p>03 MR. BOLAND: Objection.</p> <p>04 A. In what regard?</p> <p>05 BY MR. MORLAN, III:</p> <p>06 Q. What -- Were you familiar with the --</p> <p>07 Mr. Kosinski's job role prior to him leaving SuttonPark</p> <p>08 Capital in late 2020?</p> <p>09 A. Yes.</p> <p>10 Q. Okay. In what capacities, did you have -- if</p> <p>11 any, did you have professional interaction with</p> <p>12 Mr. Kosinski prior to his leaving SuttonPark Capital?</p> <p>13 MR. BOLAND: Object to form.</p> <p>14 A. He was the CEO.</p> <p>15 BY MR. MORLAN, III:</p> <p>16 Q. As you sit here today, are you sure whether he</p> <p>17 was the CEO or the CFO?</p> <p>18 A. I believe he was the CEO.</p> <p>19 Q. And did you work on any specific projects with</p> <p>20 Mr. Kosinski prior to his departure?</p> <p>21 A. Going to invoke the fifth.</p> <p>22 Q. Did you report to Mr. Kosinski at any time</p> <p>23 during your tenure at SuttonPark?</p> <p>24 A. Yes.</p> <p>25 Q. And did you and Mr. Kosinski ever have any</p>	<p style="text-align: right;">Page 69</p> <p>01 A. Could you repeat that? I apologize.</p> <p>02 Q. Sure. Are you aware of the allegations</p> <p>03 against Mr. Kosinski and Saiph Consulting in this</p> <p>04 lawsuit that we're here on today?</p> <p>05 A. Not entirely, but I'm --</p> <p>06 Q. What is your understanding of the main issues</p> <p>07 in the lawsuit that you're being deposed about today?</p> <p>08 MR. BOLAND: Object to form.</p> <p>09 A. As I had stated earlier, I had seen an article</p> <p>10 and it described a break-in to the SuttonPark office</p> <p>11 related with Noah Davis. But I don't have much other</p> <p>12 understanding of the issues.</p> <p>13 BY MR. MORLAN, III:</p> <p>14 Q. Are you aware of any evidence that in any way</p> <p>15 links Paul Kosinski to the allegations against Mr. Davis</p> <p>16 pertaining to the physical break-in of at SuttonPark's</p> <p>17 office that you just referenced?</p> <p>18 MR. BOLAND: Object to form.</p> <p>19 A. I'm going to invoke the fifth.</p> <p>20 BY MR. MORLAN, III:</p> <p>21 Q. Are you aware of any evidence that links Saiph</p> <p>22 Consulting to the physical break-in at SuttonPark,</p> <p>23 that's been alleged against Mr. Davis in this action?</p> <p>24 MR. BOLAND: Object to form.</p> <p>25 A. Can you repeat that? I'm sorry.</p>

<p style="text-align: right;">Page 70</p> <p>01 BY MR. MORLAN, III:</p> <p>02 Q. Sure. Are you aware of any evidence that</p> <p>03 links SuttonPark, I'm sorry that links at -- Let me</p> <p>04 strike that.</p> <p>05 Are you aware of any evidence linking Saiph</p> <p>06 Consulting, LLC to the break-in alleged against Noah</p> <p>07 Davis in this lawsuit?</p> <p>08 MR. BOLAND: Object to form.</p> <p>09 A. I'm going to invoke the fifth.</p> <p>10 BY MR. MORLAN, III:</p> <p>11 Q. Okay. And to be clear, when I say the break-</p> <p>12 in alleged, I mean, the allegations that Mr. Davis</p> <p>13 unlawfully entered SuttonPark's premises on or about,</p> <p>14 September 5, 2024, just to make that clear, do you</p> <p>15 understand that? When I say break-in, that's what I'm</p> <p>16 referring to?</p> <p>17 A. What was the question there?</p> <p>18 Q. I just want to make sure that we're on the</p> <p>19 same page. You mentioned allegations of a break-in</p> <p>20 earlier. I want to make sure that we're talking about</p> <p>21 the same thing.</p> <p>22 So, when you were referring to allegations of</p> <p>23 a break-in, are you referring to allegations in the</p> <p>24 complaint in this action that Noah Davis entered</p> <p>25 SuttonPark's offices without authorization on September</p>	<p style="text-align: right;">Page 72</p> <p>01 about any of the cyber intrusions alleged against</p> <p>02 Mr. Davis in this action?</p> <p>03 A. No. Again, I heard about the issue or the</p> <p>04 break-in through a news article. So, that was the</p> <p>05 extent of any knowledge I would have on the matter.</p> <p>06 Q. Okay. And when you say the break-in the news</p> <p>07 article, is that just -- did that article just refer to</p> <p>08 the -- to a physical break-in or also to a computer or</p> <p>09 cyber intrusion?</p> <p>10 A. I can't recall exactly what the extent the</p> <p>11 article particularly, but it could have. I honestly</p> <p>12 don't recall.</p> <p>13 Q. Okay. But you don't have any knowledge</p> <p>14 regarding any cyber intrusions that may have occurred at</p> <p>15 777 Partners or SuttonPark during May, June, July,</p> <p>16 August, or September of last year?</p> <p>17 A. I have no knowledge really of the case itself</p> <p>18 other than, as I said, from a news article. So, it's</p> <p>19 hard to give you more information on that.</p> <p>20 Q. Okay. Are you familiar with the MP FIN</p> <p>21 system?</p> <p>22 A. I'm going to invoke the fifth.</p> <p>23 Q. Is the MP FIN system something that you used</p> <p>24 in your day-to-day responsibilities in your role at 777</p> <p>25 Partners?</p>
<p style="text-align: right;">Page 71</p> <p>01 5th, 2024, or near that time?</p> <p>02 MR. BOLAND: Object to form.</p> <p>03 A. I was strictly speaking to the news article,</p> <p>04 which again, I can't recall the details or which outlet</p> <p>05 it was from, but that was all I was referring to. I</p> <p>06 don't have any other information.</p> <p>07 BY MR. MORLAN, III:</p> <p>08 Q. Okay. Are you familiar at all with the</p> <p>09 allegations of a computer or cyber intrusion that</p> <p>10 Mr. Davis is alleged to have made with respect to</p> <p>11 SuttonPark Capital and 777 Partners' computer systems?</p> <p>12 A. I don't have any information regarding the</p> <p>13 issue.</p> <p>14 Q. Are you aware of any evidence linking</p> <p>15 Mr. Kosinski and any alleged cyber intrusions -- alleged</p> <p>16 to have been committed by Mr. Davis?</p> <p>17 A. I don't have any information regarding that.</p> <p>18 Q. Are you aware of any evidence linking Saiph</p> <p>19 Consulting, LLC to any of the cyber intrusions alleged</p> <p>20 against Mr. Davis in this action?</p> <p>21 MR. BOLAND: Object to form.</p> <p>22 A. Again, I'm unfamiliar with the issue at hand,</p> <p>23 so I don't have any information to provide.</p> <p>24 BY MR. MORLAN, III:</p> <p>25 Q. Okay. So, you don't have any information</p>	<p style="text-align: right;">Page 73</p> <p>01 A. I'm going to invoke the fifth.</p> <p>02 Q. Do you know what's the term top off means in</p> <p>03 the context of an e-mail asking whether or not certain</p> <p>04 accounts should be topped off in advance of reports to</p> <p>05 Leadenhall. Does that term ring any bell?</p> <p>06 MR. BOLAND: Object to form.</p> <p>07 A. I'm going to invoke the fifth.</p> <p>08 BY MR. MORLAN, III:</p> <p>09 Q. Do you know what the term top off means in</p> <p>10 general?</p> <p>11 A. Going to invoke the fifth.</p> <p>12 Q. Do you know what a protective advance is?</p> <p>13 A. Going to invoke the fifth.</p> <p>14 Q. During the course of your time at 777</p> <p>15 Partners, have you ever heard anyone else say anything</p> <p>16 negative about Paul Kosinski?</p> <p>17 A. I'm going to invoke the fifth.</p> <p>18 Q. During your time at 777 Partners, have you</p> <p>19 ever said anything negative about Mr. Kosinski?</p> <p>20 A. Going to invoke the fifth.</p> <p>21 Q. What, if any, information do you have</p> <p>22 regarding Mr. Kosinski's departure from his former role</p> <p>23 at SuttonPark Capital?</p> <p>24 A. I can't recall specifically.</p> <p>25 Q. What is your current title for -- at 777</p>

<p style="text-align: right;">Page 74</p> <p>01 Partners?</p> <p>02 A. Going to invoke the fifth.</p> <p>03 Q. Are you presently employed by 777 Partners?</p> <p>04 A. Yes.</p> <p>05 Q. Does 777 Partners have a policy or program</p> <p>06 under which they provide Counsel to their employees or</p> <p>07 former employees related to incidents arising out of</p> <p>08 their job duties?</p> <p>09 MR. BOLAND: Object to form.</p> <p>10 A. I'm invoking the fifth.</p> <p>11 BY MR. MORLAN, III:</p> <p>12 Q. Has 777 Partners paid for your Counsel to</p> <p>13 represent you in this deposition?</p> <p>14 A. I'm invoking the fifth.</p> <p>15 Q. Has 777 Partners paid for Counsel to represent</p> <p>16 you, in connection with any other matter?</p> <p>17 A. I'm invoking the fifth.</p> <p>18 Q. Are you aware of whether or not there is a</p> <p>19 justice department investigation pending as to certain</p> <p>20 activities and allegations against 777 Partners in</p> <p>21 SuttonPark Capital?</p> <p>22 A. Invoking the fifth.</p> <p>23 Q. Do you know whether you're a target of any</p> <p>24 federal investigation that relates in any way to your</p> <p>25 role at 777 Partners?</p>	<p style="text-align: right;">Page 76</p> <p>01 usability or reliability like that currently?</p> <p>02 A. I'm invoking the fifth.</p> <p>03 Q. Do you use the MP FIN system on a day-to-day</p> <p>04 basis as part of your roles and duties at 777?</p> <p>05 A. I'm invoking the fifth.</p> <p>06 Q. When was the last time you accessed the MP FIN</p> <p>07 system?</p> <p>08 A. I'm invoking the fifth.</p> <p>09 Q. Have you ever been asked to modify any</p> <p>10 information within the MP FIN system?</p> <p>11 A. I'm invoking the fifth.</p> <p>12 THE VIDEOGRAPHER: This is the Videographer.</p> <p>13 Can I go off for a media change?</p> <p>14 MR. MORLAN, III: Sure.</p> <p>15 THE VIDEOGRAPHER: This ends Media 1, we're</p> <p>16 going off record. The time is 11:41 A.M.</p> <p>17 (Thereupon, a short discussion was held off</p> <p>18 record.)</p> <p>19 (Deposition resumed.)</p> <p>20 THE VIDEOGRAPHER: Okay. Standby. This</p> <p>21 begins Media 2. We're back on the record. The</p> <p>22 time is 11:41 A.M.</p> <p>23 BY MR. MORLAN, III:</p> <p>24 Q. Do you know what I mean when I say the MP FIN</p> <p>25 system?</p>
<p style="text-align: right;">Page 75</p> <p>01 A. I'm invoking the fifth.</p> <p>02 Q. Do you know who Karen Gorde is?</p> <p>03 A. Yes.</p> <p>04 Q. Who is Karen Gorde?</p> <p>05 A. Employee of, I believe, SuttonPark.</p> <p>06 Q. And what was Karen Gorde's role at SuttonPark?</p> <p>07 A. She was an accountant.</p> <p>08 Q. Do you have any information or evidence that</p> <p>09 would indicate that Ms. Gorde is not trustworthy?</p> <p>10 MR. BOLAND: Object to form.</p> <p>11 A. I'm going to invoke the fifth.</p> <p>12 BY MR. MORLAN, III:</p> <p>13 Q. Were you asked to make any modifications to</p> <p>14 the MP FIN system relating to the pledging of collateral</p> <p>15 by anyone at 777?</p> <p>16 MR. BOLAND: Object to form.</p> <p>17 A. I'm invoking the fifth.</p> <p>18 BY MR. MORLAN, III:</p> <p>19 Q. Were you ever asked by anyone at 777 or on</p> <p>20 behalf of 777 to assist in any way with the collateral</p> <p>21 audit that Saiph Consulting was performing on behalf of</p> <p>22 Leadenhall?</p> <p>23 A. I'm invoking the fifth.</p> <p>24 Q. Do you know whether there's currently any</p> <p>25 problems with the MP FIN system in terms of its</p>	<p style="text-align: right;">Page 77</p> <p>01 A. I'm invoking the fifth.</p> <p>02 Q. Do you know whether Noah Davis was ever</p> <p>03 contacted as part of a grand jury investigation into 777</p> <p>04 Partners?</p> <p>05 A. I have no knowledge.</p> <p>06 Q. And for purposes of this deposition, when I</p> <p>07 say 777 Partners or SuttonPark, I'm using those terms</p> <p>08 interchangeably because they're both Plaintiffs in the</p> <p>09 lawsuit. So, I just want to make sure that that that's</p> <p>10 clear.</p> <p>11 And, if I say one or the other, and it would</p> <p>12 change your answer to the question if it was only, you</p> <p>13 know, specifically as to one or the other, would you let</p> <p>14 me know?</p> <p>15 A. Okay.</p> <p>16 Q. And insofar as I've -- the questions I've</p> <p>17 previously asked you, would it matter -- would it change</p> <p>18 your answers, if I was talking about only one or the</p> <p>19 other?</p> <p>20 MR. BOLAND: Object to form.</p> <p>21 A. I'm not sure how to answer that. What do you</p> <p>22 mean, can you repeat that?</p> <p>23 BY MR. MORLAN, III:</p> <p>24 Q. I just mean, do I need to go back and re-ask</p> <p>25 the questions specifically and separately as to</p>

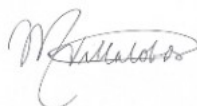
<p style="text-align: right;">Page 78</p> <p>01 SuttonPark Capital versus 777 Partners, in order to be 02 clear?</p> <p>03 Like, is there a material difference, in other 04 words, between those two entities that would affect your 05 answers to the questions that I've asked?</p> <p>06 MR. BOLAND: Objection.</p> <p>07 A. I believe I answered the questions to the best 08 of my ability.</p> <p>09 BY MR. MORLAN, III:</p> <p>10 Q. Okay. And would your answers be different, if 11 there was a distinction made between 777 Partners and 12 SuttonPark Capital, LLC?</p> <p>13 MR. BOLAND: Object to form.</p> <p>14 A. I'm not sure how to answer that. I don't 15 think I understand the question.</p> <p>16 BY MR. MORLAN, III:</p> <p>17 Q. Well, the reason I'm asking is that, both 777 18 Partners and SuttonPark are Plaintiffs in this 19 particular lawsuit. And I'm trying to streamline my 20 questions here given that you've already answered some 21 and that for purposes of this lawsuit, the -- both are 22 Plaintiffs, both are making the same allegations and I 23 just wanted to make sure that in treating both of them 24 essentially as alter egos, I'm not missing something or, 25 you know, creating any uncertainty in the way that I'm</p>	<p style="text-align: right;">Page 80</p> <p>01 Q. Correct. Who did you understand your employer 02 to be when you first became involved, when you said you 03 started your position with 777 Partners seven years ago?</p> <p>04 A. 777.</p> <p>05 Q. Okay. And did you consider 777 to be your 06 employer since you started to the present or did it, at 07 some point, change to SuttonPark Capital?</p> <p>08 A. Are you saying, did it change from 777 to 09 SuttonPark Capital?</p> <p>10 Q. Correct.</p> <p>11 A. No. I was hired as a part time job for 12 SuttonPark and transferred to 777 at some point.</p> <p>13 Q. Approximately when did you transfer to 777?</p> <p>14 A. I believe when I started the seven-year tenure 15 with 777 back in 2018.</p> <p>16 Q. When was the last time you spoke with Noah 17 Davis?</p> <p>18 A. I honestly can't recall in passing, in the 19 office at some point.</p> <p>20 Q. Was this current lawsuit brought for purposes, 21 at least in part of retaliating against Saiph Consulting 22 for his role in the collateral audit?</p> <p>23 MR. BOLAND: Object to form.</p> <p>24 A. I'm invoking the fifth.</p> <p>25 BY MR. MORLAN, III:</p>
<p style="text-align: right;">Page 79</p> <p>01 asking you the questions. Does that make sense?</p> <p>02 MR. BOLAND: Object to form.</p> <p>03 A. I believe so. Again, I think I answered the 04 questions to the best of my ability so far.</p> <p>05 BY MR. MORLAN, III:</p> <p>06 Q. Okay. And when you say to the best of your 07 ability, what I'm saying is do I need to re-ask the 08 questions to specifically isolate 777 Partners and 09 SuttonPark Capital, because that would change your 10 answers, or would your answers be the same regardless of 11 whether I'm talking about only one or the other or both?</p> <p>12 MR. BOLAND: Object to form.</p> <p>13 A. You've asked me a lot of questions. It would 14 probably depend on the question, and I -- honestly, I 15 think that I answered them correctly, so.</p> <p>16 BY MR. MORLAN, III:</p> <p>17 Q. Okay. Have you ever worked directly for 18 SuttonPark Capital, LLC?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Have you ever worked directly for 777 21 Partners, LLC?</p> <p>22 A. Yes.</p> <p>23 Q. Have you worked for both of them at the same 24 time?</p> <p>25 A. How do you mean, having two jobs?</p>	<p style="text-align: right;">Page 81</p> <p>01 Q. And do you know whether this lawsuit was 02 brought for purposes of retaliating against Mr. Kosinski 03 for his role in the collateral audit?</p> <p>04 MR. BOLAND: Object to form.</p> <p>05 A. I'm invoking the fifth.</p> <p>06 BY MR. MORLAN, III:</p> <p>07 Q. And do you know whether this lawsuit was 08 brought for the purposes of disincentivizing other 09 financial professionals from performing work on behalf 10 of other creditors to 777 Partners or SuttonPark 11 Capital?</p> <p>12 MR. BOLAND: Object to form.</p> <p>13 A. I'm invoking the fifth.</p> <p>14 BY MR. MORLAN, III:</p> <p>15 Q. And are you aware that there are allegations 16 in the complaint that Noah Davis modified information in 17 the MP FIN system?</p> <p>18 MR. BOLAND: Object to form.</p> <p>19 A. I'm invoking the fifth.</p> <p>20 BY MR. MORLAN, III:</p> <p>21 Q. And are the allegations in the complaint with 22 respect to modifications of the MP FIN system intended 23 to provide cover for other modifications of the MP FIN 24 system, that were made in order to conceal the double 25 pledging of collateral?</p>


<p style="text-align: right;">Page 82</p> <p>01 MR. BOLAND: Object to form.</p> <p>02 A. I'm invoking the fifth.</p> <p>03 BY MR. MORLAN, III:</p> <p>04 Q. Are you aware of any modifications to the MP</p> <p>05 FIN system that were made in order to conceal</p> <p>06 information from 777 or SuttonPark Capital's creditors?</p> <p>07 A. I'm invoking the fifth.</p> <p>08 Q. Are you aware that Leadenhall communicated</p> <p>09 with 777 or its agents to request access to their</p> <p>10 systems for purposes of performing a collateral audit?</p> <p>11 A. I'm invoking the fifth.</p> <p>12 Q. And are you aware that the first</p> <p>13 communications with respect to Leadenhall asking 777 for</p> <p>14 access to its systems in order to perform a collateral</p> <p>15 audit occurred during or about July of 2023?</p> <p>16 MR. BOLAND: Object to form.</p> <p>17 A. I'm invoking the fifth.</p> <p>18 BY MR. MORLAN, III:</p> <p>19 Q. And are you aware that 777 Partners did not</p> <p>20 permit access to its systems for purposes of the</p> <p>21 collateral audit until some time in May of 2024?</p> <p>22 MR. BOLAND: Object to form.</p> <p>23 A. I'm going to invoke the fifth.</p> <p>24 BY MR. MORLAN, III:</p> <p>25 Q. So, for purposes of my next question, I'm</p>	<p style="text-align: right;">Page 84</p> <p>01 BY MR. MORLAN, III:</p> <p>02 Q. In our allegations related to problems with</p> <p>03 the integrity, usability, and reliability of the MP FIN</p> <p>04 system in this lawsuit, intended to provide cover or</p> <p>05 modifications made to the MP FIN system in order to</p> <p>06 conceal wrongful conduct by 777 Partners?</p> <p>07 A. I'm invoking the fifth.</p> <p>08 Q. Would your answer be different if I ask the</p> <p>09 same question, but with respect to SuttonPark Capital,</p> <p>10 LLC?</p> <p>11 A. I'm invoking the fifth.</p> <p>12 Q. Do you know whether anyone at 777 or</p> <p>13 SuttonPark encourage Mr. Davis to physically enter</p> <p>14 SuttonPark's offices in September of 2024?</p> <p>15 MR. BOLAND: Object to form.</p> <p>16 A. Sorry. What was the question?</p> <p>17 BY MR. MORLAN, III:</p> <p>18 Q. Do you know whether anyone affiliated with 777</p> <p>19 Partners and/or SuttonPark Capital encouraged Mr. Davis</p> <p>20 to physically enter the premises of SuttonPark's offices</p> <p>21 in early September of 2024?</p> <p>22 MR. BOLAND: Object to form.</p> <p>23 A. No, I don't have any knowledge.</p> <p>24 BY MR. MORLAN, III:</p> <p>25 Q. Do you know whether Paul Kosinski or Saiph</p>
<p style="text-align: right;">Page 83</p> <p>01 going to refer to the time period between July of 2023</p> <p>02 and May of 2024, when access was ultimately granted to</p> <p>03 Leadenhall's agents for the collateral as the delay</p> <p>04 period.</p> <p>05 Is that sufficiently clear just for purposes</p> <p>06 of my question?</p> <p>07 A. Yes.</p> <p>08 Q. Okay. So, was one of the purposes of the</p> <p>09 delay period to stall the collateral audit in order to</p> <p>10 conceal evidence of the double pledging of collateral?</p> <p>11 MR. BOLAND: Object to form.</p> <p>12 A. I'm invoking the fifth.</p> <p>13 BY MR. MORLAN, III:</p> <p>14 Q. And was the purpose of the delay period to</p> <p>15 allow time to conceal evidence of potential wrongdoing</p> <p>16 by 777 Partners?</p> <p>17 MR. BOLAND: Object to form.</p> <p>18 A. I'm invoking the fifth.</p> <p>19 BY MR. MORLAN, III:</p> <p>20 Q. Was the purpose of the delay period to make</p> <p>21 certain changes within the MP FIN system in an effort to</p> <p>22 conceal evidence of wrongdoing by 777 Partners or</p> <p>23 SuttonPark Capital?</p> <p>24 MR. BOLAND: Object to form.</p> <p>25 A. I'm invoking the fifth.</p>	<p style="text-align: right;">Page 85</p> <p>01 Consulting encouraged Mr. Davis to physically enter</p> <p>02 SuttonPark's offices on or about September of 2024?</p> <p>03 A. Again, I heard about this through a news</p> <p>04 article, so I really don't have any information</p> <p>05 regarding the instances surrounding.</p> <p>06 Q. Okay. And to be clear, you don't -- your</p> <p>07 testimony is that you don't have any information</p> <p>08 regarding any alleged computer intrusions that are</p> <p>09 related to the matter, that we're here on today.</p> <p>10 Correct?</p> <p>11 MR. BOLAND: Object to form.</p> <p>12 A. The only information that I have is as I</p> <p>13 stated previously.</p> <p>14 BY MR. MORLAN, III:</p> <p>15 Q. And that would be from the news article?</p> <p>16 A. Correct.</p> <p>17 Q. Who do you currently report to at the 777</p> <p>18 Partners?</p> <p>19 A. I'm going to invoke the fifth.</p> <p>20 Q. What role is B. Riley currently playing at 777</p> <p>21 Partners?</p> <p>22 MR. BOLAND: Object to form.</p> <p>23 A. I'm going to invoke the fifth.</p> <p>24 BY MR. MORLAN, III:</p> <p>25 Q. Do you know who Mark Shapiro is?</p>



<p style="text-align: right;">Page 86</p> <p>01 A. Yes.</p> <p>02 Q. Have you ever spoken with Mark Shapiro about</p> <p>03 this case?</p> <p>04 A. No.</p> <p>05 Q. Did you say, no?</p> <p>06 A. No.</p> <p>07 Q. Have you ever discussed with Mark Shapiro,</p> <p>08 your role in providing reports to Leadenhall?</p> <p>09 A. Going to invoke the fifth.</p> <p>10 Q. Has Mark Shapiro ever directed you to do</p> <p>11 anything with respect to your role with 777 Partners?</p> <p>12 MR. BOLAND: Object to form.</p> <p>13 A. I'm going to invoke the fifth.</p> <p>14 BY MR. MORLAN, III:</p> <p>15 Q. Has Mark Shapiro ever asked you about any</p> <p>16 actions that you've taken as an employee of 777</p> <p>17 Partners?</p> <p>18 MR. BOLAND: Object to form.</p> <p>19 A. I'm going to invoke the fifth.</p> <p>20 BY MR. MORLAN, III:</p> <p>21 Q. Has anyone from B. Riley ever asked you about</p> <p>22 any actions you've taken during your tenure as an</p> <p>23 employee of 777 Partners?</p> <p>24 MR. BOLAND: Object to form.</p> <p>25 A. Going to invoke the fifth.</p>	<p style="text-align: right;">Page 88</p> <p>01 A. I'm invoking the fifth.</p> <p>02 MR. MORLAN, III: All right. I'm going to</p> <p>03 take a quick break for about five minutes to go</p> <p>04 through my notes.</p> <p>05 THE WITNESS: Okay.</p> <p>06 THE COURT REPORTER: I think he froze. We're</p> <p>07 going off the record. The time is 12:03 P.M.</p> <p>08 MR. MORLAN, III: I think we froze there for a</p> <p>09 second. I don't know if you guys heard my</p> <p>10 question. I said I want to just take a five-</p> <p>11 minute break, review my notes, and then, we'll --</p> <p>12 I'll either have relatively little or I may be</p> <p>13 finished. Does anybody else have anything? Jim?</p> <p>14 MR. BOLAND: Not at the moment, no.</p> <p>15 MR. MORLAN, III: Okay. All right. Let's go</p> <p>16 off the record and, hopefully, wrap this up here in</p> <p>17 a minute.</p> <p>18 THE COURT REPORTER: We're off the record.</p> <p>19 (Thereupon, a short discussion was held off</p> <p>20 record.)</p> <p>21 (Deposition resumed.)</p> <p>22 THE COURT REPORTER: We are back on the</p> <p>23 record. The time is 12:07 P.M.</p> <p>24 BY MR. MORLAN, III:</p> <p>25 Q. Do you know whether any documents contained</p>
<p style="text-align: right;">Page 87</p> <p>01 BY MR. MORLAN, III:</p> <p>02 Q. Has anyone from B. Riley ever asked you</p> <p>03 anything about your role with respect to the preparation</p> <p>04 of compliance reports for Leadenhall?</p> <p>05 A. Going to invoke the fifth.</p> <p>06 Q. And was one of the purposes of filing this</p> <p>07 lawsuit to discourage other 777 employees from</p> <p>08 participating in the grand jury investigation with</p> <p>09 respect to 777 Partners?</p> <p>10 MR. BOLAND: Object to form.</p> <p>11 A. I'm invoking the fifth.</p> <p>12 BY MR. MORLAN, III:</p> <p>13 Q. And do you know what I mean when I say the New</p> <p>14 York litigation that's related to this case?</p> <p>15 A. I'm invoking the fifth.</p> <p>16 Q. But you are aware that there was a complaint</p> <p>17 filed by Leadenhall and the Southern District Of New</p> <p>18 York against 777 Partners and others. Is that correct?</p> <p>19 A. I'm invoking the fifth.</p> <p>20 Q. Have you discussed the allegations in the New</p> <p>21 York complaint with anybody other than your Attorney?</p> <p>22 A. I'm invoking the fifth.</p> <p>23 Q. Have you discussed the allegations of the</p> <p>24 complaint that we're here on with anybody other than</p> <p>25 your Attorney?</p>	<p style="text-align: right;">Page 89</p> <p>01 within Steve Pasko's e-mail correspondence, could be</p> <p>02 potentially useful to Leadenhall in New York litigation?</p> <p>03 MR. BOLAND: Object to form.</p> <p>04 A. I'm invoking the fifth.</p> <p>05 BY MR. MORLAN, III:</p> <p>06 Q. Have you been asked to assist with collecting</p> <p>07 any documents for purposes of discovery in this case</p> <p>08 that we're here on today?</p> <p>09 A. I believe it was noted in the complaint, can't</p> <p>10 recall.</p> <p>11 MR. MURRAY: I can't answer for you. Got it.</p> <p>12 MR. DONOVAN: Yeah.</p> <p>13 A. I believe it was noted in the -- in the notice</p> <p>14 to appear here, but I can't recall specifically.</p> <p>15 BY MR. MORLAN, III:</p> <p>16 Q. Well, have you collected any documents to</p> <p>17 provide to 777 or anyone else in connection with this</p> <p>18 particular lawsuit that we're here on today?</p> <p>19 MR. BOLAND: Object to form.</p> <p>20 A. I'm going to invoke the fifth.</p> <p>21 BY MR. MORLAN, III:</p> <p>22 Q. Were you asked to preserve any documents in</p> <p>23 connection with the litigation that we're here on today?</p> <p>24 A. I'm going to invoke the fifth.</p> <p>25 Q. Were you instructed to delete any documents</p>

<p style="text-align: right;">Page 90</p> <p>01 related to any of the subject matter that we've</p> <p>02 discussed in this deposition, including Mr. Donovan's</p> <p>03 questions?</p> <p>04 MR. BOLAND: Objection.</p> <p>05 A. I'm going to invoke the fifth.</p> <p>06 BY MR. MORLAN, III:</p> <p>07 Q. Are you familiar with the results of the</p> <p>08 collateral audit that is at issue with this litigation?</p> <p>09 A. I'm going to invoke the fifth.</p> <p>10 Q. Wouldn't the information pertaining to</p> <p>11 Leaden--</p> <p>12 A. I think you cut off.</p> <p>13 Q. -- to support the results of the audit that</p> <p>14 was performed, the collateral audit that's at issue in</p> <p>15 this litigation?</p> <p>16 MR. DONOVAN: Mr. Morlan, your audio just cut</p> <p>17 out in the middle of that question. So, could you</p> <p>18 try that question again?</p> <p>19 MR. MORLAN, III: Sure. Is it your</p> <p>20 understanding --</p> <p>21 THE COURT REPORTER: Oh, he got kicked off.</p> <p>22 MR. BOLAND: And he's gone.</p> <p>23 THE COURT REPORTER: He's back on.</p> <p>24 MR. DONOVAN: All right. So, Mr. Morlan just</p> <p>25 got kicked out of the Zoom, it looks like and so --</p>	<p style="text-align: right;">Page 92</p> <p>01 Q. And is it your understanding that the</p> <p>02 information contained within MP FIN as the Leadenhall,</p> <p>03 along with any other documents that Leadenhall was</p> <p>04 previously provided by 777, would be sufficient to</p> <p>05 support the findings of the audit that Saiph performed</p> <p>06 related to this action?</p> <p>07 A. I'm invoking the fifth.</p> <p>08 Q. Did -- wander -- about any issues with respect</p> <p>09 to the double pledging of collateral?</p> <p>10 MR. BOLAND: Did it just be that Mr., Morlan's</p> <p>11 question cut out?</p> <p>12 THE COURT REPORTER: It cut out.</p> <p>13 MR. DONOVAN: Cut out a little.</p> <p>14 MR. BOLAND: Yeah, we got only the last part</p> <p>15 of it.</p> <p>16 MR. MORLAN, III: Okay.</p> <p>17 BY MR. MORLAN, III:</p> <p>18 Q. Have you spoken with Mr. -- let me start over.</p> <p>19 MR. MORLAN, III: Are you hearing me now? Am</p> <p>20 I clear or am I breaking up?</p> <p>21 THE COURT REPORTER: You're clear.</p> <p>22 MR. DONOVAN: Yeah.</p> <p>23 BY MR. MORLAN, III:</p> <p>24 Q. Have you spoken with Josh Wander regarding any</p> <p>25 of the issues with respect to the double pledging of</p>
<p style="text-align: right;">Page 91</p> <p>01 MR. MORLAN, III: I think I'm back now.</p> <p>02 MR. DONOVAN: Oh, you're back now. Okay.</p> <p>03 All right.</p> <p>04 MR. MORLAN, III: That was --</p> <p>05 MR. BOLAND: Last question didn't come in,</p> <p>06 though.</p> <p>07 MR. MORLAN, III: Okay.</p> <p>08 BY MR. MORLAN, III:</p> <p>09 Q. There's been some allegations in this</p> <p>10 litigation of a conspiracy to obtain improperly</p> <p>11 information that might be useful to Leadenhall in the</p> <p>12 New York litigation.</p> <p>13 Are you familiar with any information that was</p> <p>14 improperly obtained by Mr. Kosinski during the time of</p> <p>15 the collateral audit at issue?</p> <p>16 MR. BOLAND: Objection.</p> <p>17 A. I'm going to invoke the fifth.</p> <p>18 BY MR. MORLAN, III:</p> <p>19 Q. And is it your understanding that Leadenhall</p> <p>20 would be entitled to review the records in MP FIN as</p> <p>21 would pertain to any collateral that was pledged to</p> <p>22 Leadenhall?</p> <p>23 MR. BOLAND: Objection.</p> <p>24 A. I'm going to invoke the fifth.</p> <p>25 BY MR. MORLAN, III:</p>	<p style="text-align: right;">Page 93</p> <p>01 collateral?</p> <p>02 MR. BOLAND: Object to form.</p> <p>03 A. I'm invoking the fifth.</p> <p>04 BY MR. MORLAN, III:</p> <p>05 Q. Have you spoke with Mr. Pasko with respect to</p> <p>06 any allegations regarding the double pledging of</p> <p>07 collateral pledged to Leadenhall?</p> <p>08 MR. BOLAND: Object to form.</p> <p>09 A. I'm invoking the fifth.</p> <p>10 BY MR. MORLAN, III:</p> <p>11 Q. Have you spoken with Mr. Wander or Mr. Pasko</p> <p>12 with respect to any of the allegations of the complaint</p> <p>13 in this action?</p> <p>14 MR. BOLAND: Object to form.</p> <p>15 A. I'm invoking the fifth.</p> <p>16 BY MR. MORLAN, III:</p> <p>17 Q. Have you spoken with either Mr. Pasko or</p> <p>18 Mr. Wander with respect to the allegations of the New</p> <p>19 York complaint?</p> <p>20 A. I'm invoking the fifth.</p> <p>21 Q. Have you spoken with Mr. Wander regarding any</p> <p>22 of the allegations against Paul Kosinski and Saiph</p> <p>23 Consulting in this matter?</p> <p>24 MR. BOLAND: Object to form.</p> <p>25 A. I'm invoking the fifth.</p>

<p style="text-align: right;">Page 94</p> <p>01 BY MR. MORLAN, III:</p> <p>02 Q. Have you ever heard anybody discussing Paul</p> <p>03 Kosinski for any purpose since his departure from</p> <p>04 SuttonPark in late 2020?</p> <p>05 MR. BOLAND: Object to form.</p> <p>06 A. I'm invoking the fifth.</p> <p>07 BY MR. MORLAN, III:</p> <p>08 Q. Have you ever had any discussions with Josh</p> <p>09 Wander regarding anything to do with Saiph Consulting</p> <p>10 LLC?</p> <p>11 A. I'm invoking the fifth.</p> <p>12 Q. Have you ever had any conversations with Josh</p> <p>13 Wander regarding Paul Kosinski?</p> <p>14 A. I'm invoking the fifth.</p> <p>15 Q. Have you ever had any conversations with Steve</p> <p>16 Pasko regarding Paul Kosinski?</p> <p>17 MR. BOLAND: Object to form.</p> <p>18 A. Invoking the fifth.</p> <p>19 BY MR. MORLAN, III:</p> <p>20 Q. Have you ever had any conversations with Steve</p> <p>21 Pasko regarding the reasons this lawsuit was brought?</p> <p>22 MR. BOLAND: Object to form.</p> <p>23 A. Invoking the fifth.</p> <p>24 BY MR. MORLAN, III:</p> <p>25 Q. Have you ever had any discussions with Josh</p>	<p style="text-align: right;">Page 96</p> <p>01 explain read or waive to him or do you just want to</p> <p>02 do it for him?</p> <p>03 MR. DONOVAN: Yeah. You can explain.</p> <p>04 THE COURT REPORTER: So, if this is ordered,</p> <p>05 the transcript of everything I wrote down, you have</p> <p>06 the choice of getting a copy that you can read or</p> <p>07 you can waive that right and just assume that I've</p> <p>08 typed everything correctly.</p> <p>09 If not, if you do read, I do send you an e-</p> <p>10 mail, with the transcript and you get to go over</p> <p>11 it. And in the event that there's something that</p> <p>12 was misunderstood or misspoken and there's an</p> <p>13 error, you would fill out an errata sheet at the</p> <p>14 Court reporting office, and you can correct any</p> <p>15 errors on it. Would you like to read or waive?</p> <p>16 THE WITNESS: I think we'll read.</p> <p>17 THE COURT REPORTER: Read?</p> <p>18 THE WITNESS: Yeah.</p> <p>19 (Deposition concluded at 12:30 P.M.)</p> <p>20 (Reading and signing of the deposition by the</p> <p>21 witness has been reserved.)</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 95</p> <p>01 Wander regarding the reason this lawsuit was brought?</p> <p>02 MR. BOLAND: Object to form.</p> <p>03 A. Invoking the fifth.</p> <p>04 BY MR. MORLAN, III:</p> <p>05 Q. Have you ever had any discussions with anyone</p> <p>06 from B. Riley as to why this lawsuit has been brought?</p> <p>07 A. Invoking the fifth.</p> <p>08 Q. Have you ever had any discussions with anybody</p> <p>09 else at 777 Partners regarding why this lawsuit was</p> <p>10 brought?</p> <p>11 MR. BOLAND: Object to form.</p> <p>12 A. Invoking the fifth.</p> <p>13 BY MR. MORLAN, III:</p> <p>14 Q. Have you ever had any discussions with anyone</p> <p>15 from 777 Partners or SuttonPark Capital regarding the</p> <p>16 damages alleged in this lawsuit?</p> <p>17 MR. BOLAND: Object to form.</p> <p>18 A. I'm invoking the fifth.</p> <p>19 MR. MORLAN, III: I have nothing further.</p> <p>20 MR. BOLAND: I have no question.</p> <p>21 MR. DONOVAN: Nothing further from me.</p> <p>22 THE VIDEOGRAPHER: This concludes today's</p> <p>23 deposition. We're going off the record. The time</p> <p>24 is 12:18 P.M.</p> <p>25 THE COURT REPORTER: All right. Can someone</p>	<p style="text-align: right;">Page 97</p> <p>01 CERTIFICATE OF REPORTER</p> <p>02 STATE OF FLORIDA</p> <p>03 COUNTY OF MIAMI-DADE</p> <p>04</p> <p>05 I, MICHELLE VILLALOBOS, Court Reporter and Notary</p> <p>06 Public for the State of Florida, do hereby certify that</p> <p>07 I was authorized to and did digitally report and</p> <p>08 transcribe the foregoing proceedings, and that the</p> <p>09 transcript is a true and complete record of my notes.</p> <p>10</p> <p>11 I further certify that I am not a relative,</p> <p>12 employee, attorney or counsel of any of the parties,</p> <p>13 nor am I a relative or employee of any of the parties'</p> <p>14 attorneys or counsel connected with the action, nor am</p> <p>15 I financially interested in the action.</p> <p>16</p> <p>17 Witness my hand this 26th day of March, 2025.</p> <p>18</p> <p>19 </p> <p>20</p> <p>21 MICHELLE VILLALOBOS, COURT REPORTER</p> <p>22 NOTARY PUBLIC, STATE OF FLORIDA</p> <p>23</p> <p>24</p> <p>25</p>

Page 98	Page 100
01 CERTIFICATE OF OATH	1 Errata Sheet
02 STATE OF FLORIDA	2
03 COUNTY OF MIAMI-DADE	3 NAME OF CASE: 777 Partners LLC & Suttonpark Capital vs Leadenhall Capital
04	4 DATE OF DEPOSITION: 03/24/2025
05 I, MICHELLE VILLALOBOS, the undersigned	5 NAME OF WITNESS: Alexander Adnani
06 authority, certify that ALEXANDER ADNANI, personally	6 Reason Codes:
07 appeared before me and was duly sworn on the 24th day	7 1. To clarify the record.
08 of March, 2025.	8 2. To conform to the facts.
09 Witness my hand this 26th day of March, 2025.	9 3. To correct transcription errors.
10	10 Page ____ Line ____ Reason ____
11 	11 From ____ to ____
12	12 Page ____ Line ____ Reason ____
13	13 From ____ to ____
14 MICHELLE VILLALOBOS, COURT REPORTER	14 Page ____ Line ____ Reason ____
15 NOTARY PUBLIC, STATE OF FLORIDA	15 From ____ to ____
16 Commission No.: HH 373556	16 Page ____ Line ____ Reason ____
17 Commission Exp: MARCH 15, 2027	17 From ____ to ____
18	18 Page ____ Line ____ Reason ____
19	19 From ____ to ____
20	20 Page ____ Line ____ Reason ____
21	21 From ____ to ____
22	22 Page ____ Line ____ Reason ____
23	23 From ____ to ____
24	24
25	25

Page 99
01 DATE: 03/26/2025
02 TO: ALEXANDER ADNANI
03 C/O Francis D. Murray, Esquire
04 Stumphauzer Kolaya Nadler & Sloman, PLLC
05 2 SOUTH BISCAYNE BOULEVARD SUITE 1600
06 MIAMI, FLORIDA 33131-1824
07
08 IN RE: 777 Partners LLC & Suttonpark Capital v.
09 Leadenhall Capital
10 CASE NO: 24-81143-CIV-DMM
11 Dear Mr. Adnani,
12 Please take notice that on 03/24/2025, you gave
13 your deposition in the above-referenced matter. At
14 that time, you did not waive signature. It is now
15 necessary that you sign your deposition. You may do so
16 by contacting your own attorney or the attorney who
17 took your deposition and make an appointment to do so
18 at their office. You may also contact our office at
19 the below number, Monday -
20 Friday, 9:00 AM - 5:00 PM, for further information and
21 assistance.
22
23 If you do not read and sign your deposition within
24 thirty (30) days, the original, which has already been
25 forwarded to the ordering attorney, may be filed with
the Clerk of the Court.
If you wish to waive your signature, sign your
name in the blank at the bottom of this letter and
promptly return it to us.
Very truly yours,
Michelle Villalobos, Court Reporter
Universal Court Reporting
(954)712-2600
I do hereby waive my signature.
_____ Alexander Adnani
Cc: via transcript: Brian Donovan, Esquire
Francis Murray, Esquire



UNIVERSAL
COURT REPORTING

Office Phone: 954-712-2600

Email: info@ucrinc.com

Website: ucrinc.com

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